

1 Friday, 27 October 2017
2 (10.30 am)
3 MR ALTMAN: Good morning, chair. Today, as everyone knows,
4 is closing statements on behalf of the core
5 participants. Chair, just so you know what the order is
6 going to be for those who wish to make a closing
7 statement, we begin with Mr Ford on behalf of
8 Rochdale Council; followed by Ms Hoyano on behalf of
9 the complainant core participants, and there has been
10 agreement, given the number of complainants that she is
11 acting on behalf of, that she should be able to speak up
12 to 45 minutes; followed by Mr Payne on behalf of
13 Lancashire Constabulary; Mr Brown on behalf of the Crown
14 Prosecution Service; followed by Ms Studd on behalf of
15 the Greater Manchester Police; and finally, although
16 I don't think Ms McGahey has anything she wishes to say,
17 on behalf of the Department for Education.
18 Following that, and perhaps a suitable break
19 depending when it comes, I will say a few words, and
20 that's all it is going to be, given the fact that we
21 made a lengthy opening statement at the beginning of
22 this hearing, and that will be the close of these public
23 hearings and this investigation.
24 THE CHAIR: Thank you, Mr Altman.
25 Mr Ford?

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1 Closing statement by MR FORD
2 MR FORD: Chair and panel members, can I explain that
3 yesterday before circulating our written note, which
4 I hope the panel has received, and our apologies again
5 for its lateness, I indicated to Ms Hoyano that
6 significant concessions would be made by the council in
7 respect of the evidence. It was her suggestion, with
8 which I entirely agreed, that it was sensible,
9 therefore, for me to go first so that she could tailor
10 her submissions in the light of what I said.
11 Chair, in opening, I read the apology made by the
12 chief executive of the borough council, Steve Rumbelow,
13 on 18 September 2017 and said a little about it.
14 We understand that some victims and survivors
15 thought that that apology, if not too little, was
16 certainly too late, and so we begin our written
17 submissions with an explanation of the timeline for the
18 council's engagement with the issues with which this
19 inquiry has been concerned following the death of
20 Cyril Smith, and in particular to explain how the
21 council's own inquiry, which it set up in 2014, started
22 but then, for reasons which I will explain, finished.
23 The death of Cyril Smith in September 2010 marked
24 the beginning of a period of greater public awareness
25 about childhood sexual abuse and the damage that it can

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1 cause. It was followed relatively shortly, a year
2 later, with the death of Jimmy Savile and in late 2012
3 exposure of Savile's abusive activities over a very long
4 period of time. If anecdotal evidence is to be
5 believed, the public outcry that resulted had the
6 beneficial effect of persuading victims that if they
7 came forward to tell their stories, their stories would
8 be believed, and many more victims did come forward as
9 a result.
10 In November 2012, as you have heard, the
11 Greater Manchester Police set up an investigation into
12 Knowl View, which became Operation Jaguar, and the terms
13 of reference which you have heard about in the evidence
14 for that investigation specifically included a reference
15 to the fact that Operation Yewtree, which was of course
16 the police and CPS investigation into Jimmy Savile, had
17 just taken place and that allegations in respect of
18 Cyril Smith had recently emerged.
19 We assume that it was as a result of that publicity
20 Operation Jaguar, and possibly revelations made in
21 parliament by Simon Danczuk, that in 2013 the council
22 started to receive letters of claim, letters of claim
23 being the first stage in the intimation of an action for
24 damages in the civil courts concerning allegations
25 arising out of Knowl View, Cambridge House, Cyril Smith

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1 and others.
2 So that was the background to the decision taken by
3 the council in January 2014 to set up its own review
4 into those matters, and specifically events at
5 Cambridge House and Knowl View between 1961 and 1995.
6 Neil Garnham, then a QC in practice, now of course
7 a High Court judge at the Queen's Bench Division, was
8 appointed and he commenced his work in April 2014. That
9 review, sadly, very shortly had to be suspended because
10 the police had launched Operation Clifton, again about
11 which you have heard in the course of this hearing, but
12 even in that relatively short period of two months,
13 Neil Garnham was able to produce what is described as
14 a draft interim report, and that was in August 2014, and
15 that is the report that you have seen in this hearing.
16 In July 2014, which was the month that
17 Operation Clifton was set up, this inquiry was announced
18 by the Home Secretary and formally established a little
19 later in March 2015. Before Operation Clifton was
20 concluded, which was September 2016, this inquiry had
21 announced that this investigation -- Knowl View,
22 Cambridge House, Cyril Smith -- would be one of
23 the first 12 investigations that would be conducted, and
24 that announcement was made in November 2015.
25 The council therefore took the decision that there

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<p>1 was an obvious overlap between the material the Garnham 2 Review was investigating and the material this inquiry 3 would consider, and so it closed the Garnham Review 4 in March 2016, prior to its conclusion, as you 5 appreciate. By that point, the council's work on 6 preparing to assist this inquiry had already begun. 7 That work, may I just say, was, as I think I said in 8 opening, extremely substantial -- more than 9 140,000 pages of documentary material was reviewed in 10 order to put together the corporate statement, and of 11 course you have heard Gail Hopper give evidence in 12 respect of that on three occasions during the course of 13 this hearing. 14 But I mention that now because it was in the course 15 of reviewing the council's documents and, of course, 16 receiving both disclosure, documentary material and 17 witness material from other core participants, including 18 victims and survivors, as a result of the process of 19 this enquiry that the council was able to conduct a full 20 and rigorous analysis of the evidence about what 21 happened at Knowl View and Cambridge House, and it was 22 as a result of that that the council realised it was 23 appropriate to make the apology, and that was done, as 24 you know, before this hearing commenced. 25 We made clear -- I hope we made clear -- in the</p> <p style="text-align: center;">Page 5</p>	<p>1 you know, was not operated by the council. It was 2 situated within Rochdale. Rochdale placed some young 3 people there. We think that it placed five people there 4 over the course of the time it operated. It was run in 5 fact, as you know, by a committee set up to run it which 6 had Cyril Smith as its honorary secretary. 7 In our written note, we have set out five areas of 8 criticism that we perceive have arisen over the course 9 of evidence and questions that have been put to 10 witnesses, and we set out the council's response in 11 relation to them, and I will briefly run through them in 12 order. 13 The first point concerns inspection of 14 Cambridge House prior to the decision of the council to 15 place children there. The council accepts that it had 16 a duty towards children, young people, in its care that 17 it placed at Cambridge House, although it has not been 18 able to establish what the national expectations were at 19 the time for young people in that group because, as you 20 appreciate, the people placed at Cambridge House had 21 reached the age of 15, which was the school leaving age 22 at the time in the early 1960s. It is not even clear to 23 us whether there were any standards. 24 We have set out in the note at paragraph 7.1 the 25 evidence that we do have about young people placed</p> <p style="text-align: center;">Page 7</p>
<p>1 opening statement that the council's apology extends to 2 all children and young people who suffered abuse whilst 3 in the care of the council, whether they were in the 4 council's care or placed at institutions run by the 5 council. The council accepts that children and young 6 people were sexually abused at Cambridge House and at 7 Knowl View and at children's homes run by the council. 8 There is a wealth of evidence that you have heard that 9 children resident at Knowl View were sexually abused by 10 Roderick Hilton, that they were sexually exploited by 11 adults at Smith Street toilets and elsewhere, and that 12 children were sexually abused by other children resident 13 at Knowl View, and the council accepts that all of that 14 happened. 15 As I said, chair, in opening, the purpose of 16 the council now is to set out specifically the ways in 17 which it accepts it let down children and young people, 18 and, as will become clear in respect of Cambridge House, 19 some of the criticisms that have been raised in evidence 20 over the course of the last few weeks are accepted, and 21 some are not, and I will be clear as to what and why, 22 but so far as Knowl View is concerned, very, very many 23 of the criticisms that have been ventilated in evidence 24 by the council. 25 I turn then to Cambridge House. Cambridge House, as</p> <p style="text-align: center;">Page 6</p>	<p>1 there. A79 we know was placed there in August 1962; A69 2 in November 1963; and A49 in July 1965. We believe from 3 other material that two other young people in the 4 council's care were placed there, A65 and B357, but 5 their files have not survived. The only surviving 6 contemporaneous material of this sort is the 7 social services files of those three individuals. 8 It is accepted that there is no evidence at all that 9 anyone on behalf of the council inspected 10 Cambridge House before any of those -- or at least 11 before the first of those young people were placed 12 there. Again, the council has not been able to identify 13 any specific statutory obligation existing at the time 14 and imposing upon the council an obligation to inspect. 15 We make the point in the note that we doubt that many 16 other authorities would have inspected an institution of 17 this type at this time, but we do accept that, judged by 18 the standards of the day, it may be the panel would take 19 the view that the council should have done. And so, 20 whilst this is not a point at which the council accepts 21 criticism, it certainly accepts that the matter is -- 22 perhaps if I can describe it as a borderline one. 23 So far as the system for placing children at 24 Cambridge House, as you will have seen, this is not an 25 area where the council accepts criticism. It is clear</p> <p style="text-align: center;">Page 8</p>

1 what the system was. There was a system where
 2 children's officers or childcare officers from local
 3 authorities, including Rochdale, would write to
 4 Cyril Smith in respect of placing children there. It is
 5 of course accepted there's been ample evidence that
 6 Smith played a significant role in deciding where the
 7 children should be placed. But we do say, doing our
 8 best to look back nearly 50 years -- more than
 9 50 years -- that a written application to the secretary
 10 of an association that ran a hostel of this sort by
 11 a local authority employee with the responsibility for
 12 children would be precisely the sort of admission system
 13 that one would expect.

14 We don't consider that council employees ought to
 15 have been put on notice of some sort of problem existing
 16 as a result of that system, and as we say at
 17 paragraph 8.3, we say it is important not to imbue
 18 evidence such as this with any kind of sinister
 19 significance which it only has now because of what we
 20 know about Cyril Smith and the activities he was engaged
 21 in.

22 So far as the third point goes, monitoring after
 23 placement, so far as children in the council's care is
 24 concerned, it is of course accepted that there was
 25 a responsibility to visit and monitor children placed at

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1 Cambridge House in order to ensure that their welfare
 2 was being considered. Again, we haven't been able to
 3 identify a specific statutory obligation that existed
 4 then, but, as you know, Lyndon Price, then the
 5 children's officer of the council, accepted when he was
 6 interviewed by Neil Garnham that children over the page
 7 of 14 should have been visited every three months. We
 8 suspect, although we don't know, that this was a local
 9 policy probably based on the provisions of
 10 the boarding-out regulations, which didn't themselves
 11 apply, because this wasn't fostering, but which set the
 12 standards that applied in that situation. It was
 13 probably a local policy based on that, which we have not
 14 been able to find. But wherever it comes from, it is
 15 accepted by the authority that that represents
 16 a reasonable standard and is a standard that the
 17 authority should have met at the time.

18 So far as the evidence of whether that standard was
 19 met, we have set out at 9.2 what we have in relation to
 20 visiting, and of course we only have what's in the file
 21 of the three individuals whose files survive. It is
 22 probably the case that if one looks at the visiting
 23 purely in terms of numbers, they were adequate, but the
 24 files themselves I think cause us to doubt that the
 25 frequency -- the intervals with which the visits took

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1 place were as the policy suggests they ought to have
 2 been.

3 We know there is evidence that the deputy children's
 4 officer visited three young people in Rochdale's care at
 5 Cambridge House on 21 January 1964 and that there were
 6 four young people there in September 1965, but, and we
 7 obviously don't shy away from this, Mr Price's evidence
 8 that when he took up the post in 1965 there was no
 9 proper record of the children that were in care and no
 10 proper record of where they were placed and there was no
 11 childcare officer with responsibility for visiting
 12 children at Cambridge House. So we accept that the
 13 monitoring requirements may not have been met fully,
 14 although there were visits in the cases where documents
 15 survive.

16 So far as children not in the council's care is
 17 concerned, I think Ms Hoyano specifically asked
 18 a question in relation to this, and the answer was that
 19 that's a matter for the statutory provisions that
 20 applied at the time. We have set them out in the note
 21 at paragraph 9.4 and we haven't seen any evidence in the
 22 council's material to suggest that those obligations
 23 were engaged in respect of any child who wasn't in the
 24 council's care at the time.

25 Fourthly, and perhaps most importantly, actual

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1 knowledge of abuse. As you know, turning to 1965, there
 2 is no document or record held by the council that
 3 suggests an awareness of abusive activity by Cyril Smith
 4 at Cambridge House whilst it operated. Lyndon Price, of
 5 course, an employee of the council, was made aware in
 6 late 1965 of an allegation of abuse by A49. It seems he
 7 didn't report that to the children's officer; he rather
 8 dealt with it in his own way, as it were. He spoke to
 9 the child himself and he spoke to a police officer with
 10 whom he was familiar shortly after he became aware of it
 11 and, as you know, he was later told that no action was
 12 to be taken.

13 It does seem that he removed the remaining Rochdale
 14 children from Cambridge House, either three or four, we
 15 are not quite sure, and that happened on 27 November.
 16 But we are not convinced from the evidence we have seen
 17 that it can be said that that occurred because of his
 18 concerns about Cyril Smith, because it was a fact, as we
 19 understand the evidence, that the home closed, or at
 20 least no further children were placed there or lived
 21 there from 30 November, just three days later. So
 22 that's the state of the evidence in relation to that.

23 It is of course accepted that, as Mr Price and
 24 indeed Mr Gavin, the children's officer who brought the
 25 complaint to Mr Price, were employees that there is

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1 a corporate knowledge on the authority. Mr Gavin
 2 reported it to Price. One can't see that anybody could
 3 criticise his conduct. Mr Price, as I have said, spoke
 4 to the child and raised the issue with the police. He
 5 became aware the police were going to do nothing
 6 further. By that stage, Cambridge House had closed and
 7 our position on that is that, judged by the standards of
 8 the day, insofar as one can ascertain them now, 50 years
 9 later, it would not be appropriate to criticise the
 10 actions of Mr Price. And if we may, we borrow
 11 Mr Altman's words, that if it turns out to be the
 12 finding that Mr Price was intimidated by Smith's power
 13 in not taking the matter any further, well, he was not
 14 the first and he wouldn't be the last.

15 The next event is 1969/1970, when the Lancashire
 16 Police investigation took place. The file in respect of
 17 that did not find its way to the council until 2012,
 18 when it started to consider I think civil claims that
 19 were intimidated. Again, there is a corporate knowledge
 20 because Mr Price and Mr Gavin both made witness
 21 statements to the police, and you have seen that. There
 22 are also in fact two further statements from those
 23 associated with the council. One is a headmaster and
 24 the other is a councillor; they were both on the
 25 management committee at Cambridge House and they all

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1 made statements, so, again, to that extent there is
 2 a corporate knowledge. But I repeat: by that stage,
 3 Cambridge House had closed and the police were, as those
 4 individuals knew, investigating Smith. So, again, we
 5 don't see that it would be right to make any particular
 6 criticism of those individuals at that point.

7 So far generally -- I will deal briefly with this --
 8 as Smith's prominent role was concerned, we have set out
 9 at 11.1 some of the extent to which Smith played
 10 a prominent role. Certainly we accept absolutely that
 11 he did. As with the point I made earlier about the
 12 admission system, one shouldn't look at that sort of
 13 evidence through the knowledge gained by hindsight that
 14 he was an abuser of children and then assume something
 15 sinister, which we submit would not have been assumed
 16 and could not have been assumed by those involved at the
 17 time.

18 That is what we say about Cambridge House.

19 Turning to Knowl View, as you know from the apology
 20 that we read out in opening, the council accepts -- and
 21 I quote -- that there were significant failings, both in
 22 the way that Knowl View was managed and in the council's
 23 response to concerns about sexual abuse within and
 24 outside the school, and those failings were described in
 25 the apology as "frankly unforgivable".

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1 It is accepted that the leadership at the school and
 2 the management of the school and the supports given to
 3 the school by the council was not adequate, and it is
 4 accepted that some of the sexual abuse that took place
 5 at Knowl View took place because of those management
 6 failings. That is intended to be a comprehensive
 7 admission, and in the light of it, we haven't analysed
 8 in our note, and I won't analyse now, in significant
 9 detail the evidence that's been given in this hearing,
 10 but we do just highlight a number of criticisms which we
 11 perceive have been made, and rightly made, some general,
 12 some specific, and I will briefly run through those.

13 I am conscious of the time and I don't want to take up
 14 more than my 30 minutes.

15 Firstly, it is accepted there were significant
 16 failures of leadership and management, a lack of focus
 17 on the purpose and function of Knowl View, a lack of
 18 suitably skilled permanent staff in key positions and
 19 financial under-resourcing. There was, as you have
 20 heard, a significant tension between care and teaching
 21 staff, but we take the point that that probably wasn't
 22 unique to Rochdale at the time.

23 There were significant failures of communication
 24 between agencies, and in particular between the
 25 Social Services Department and the Education Department.

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1 Officers of those departments failed to work together.
 2 The school, as you know, was run by education, but
 3 social services plainly had an ongoing statutory
 4 responsibility under the various legislation that was in
 5 force over the period of time. I think the
 6 Childcare Act 1948 -- the Children Act 1948, the
 7 Childcare Act 1980 and the Children Act 1989, to protect
 8 children who were at risk of harm or in need of
 9 accommodation. Social services, it is accepted, ought
 10 to have had a much greater role in the lives of some of
 11 the children placed at Knowl View.

12 Thirdly, there were significant failures of
 13 communication between individuals. Systems were not in
 14 place to ensure that important information was passed
 15 between key individuals. Neither Mr Davey nor
 16 Mrs Cavanagh nor Mr Bradshaw, all of whom you have heard
 17 from, had any kind of adequate briefing or handover when
 18 they took up their posts. None was given adequate
 19 information about harm caused to children in the past
 20 and it is accepted that that would have impeded their
 21 ability to deal with it.

22 Mr Davey seemed not even to have known that children
 23 in the council's care were placed at Knowl View or that
 24 it was used as an alternative to residential care and,
 25 indeed, in a few cases, that children were placed in two

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1 residential settings: one for schooling and one by the
 2 Social Services Department for other purposes. He
 3 accepted, Mr Davey, that that should not have happened
 4 and, if he had have known about it, he would have put
 5 a stop to it.

6 There were similar problems between officers and
 7 elected members, and you have heard evidence that
 8 officers accepted that they had a responsibility to
 9 bring important issues to the attention of the elected
 10 members and the elected members assert that the means by
 11 which that information should have come to them was via
 12 the senior officers. Whatever the resolution of
 13 the various factual issues and disputes you have heard
 14 about, whether people were told or would have been told
 15 or whatever the resolution of those if they need to be
 16 resolved, the fact is that there was evidently no system
 17 in place to ensure that important information was
 18 disseminated as it should have been. We take no
 19 position in relation to those various factual disputes
 20 today, but we do accept that there should have been an
 21 escalation system in place and, plainly, either there
 22 wasn't or, if there was, it wasn't operating
 23 effectively.

24 A brief word about the issue that arose towards the
 25 end of the evidence between Councillors Farnell and

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1 Joinson. We do say that the evidential position in
 2 respect of this is rather unsatisfactory. The important
 3 documentary material, so far as Mr Joinson's evidence is
 4 concerned, which is the note you have seen of a meeting
 5 which he says took place on 11 June 2014 and two witness
 6 statements, was not disclosed to core participants until
 7 the morning of Mr Farnell's evidence. It is right to
 8 say that Mr Farnell had had those documents put to him
 9 in interview, but they weren't disclosed to us.

10 Mr Joinson, who it was anticipated would not be
 11 called to give evidence, was called at the last minute
 12 at the end of this hearing in order to deal with this
 13 evidence, and, as you know, allegation and
 14 counter-allegation were made by these witnesses in
 15 respect of the evidence of the other.

16 After the evidence that was given on the last day of
 17 evidence by Mr Joinson, the council circulated
 18 a document -- I say "circulated" rather than disclosed,
 19 because it was a public document which had at all times
 20 been available for all to see -- the note of a council
 21 meeting which took place on 4 June. It does show that,
 22 at the very least, everything that Mr Joinson said
 23 cannot have been correct. I say that because the
 24 evidence he gave was clearly that the meeting he had
 25 with Mr Farnell on the 11th was a meeting to arrange

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1 positions on authority committees and so on at a meeting
 2 which was due to take place in the near future. He said
 3 that he had with him -- this is a quote from his
 4 evidence on Wednesday -- "application forms from all of
 5 the members for the group positions" and it was that
 6 that he met Mr Farnell to discuss.

7 That can't be right because the meeting at which
 8 those issues were resolved took place a week earlier, on
 9 the 4th. I have said we don't take a position on these
 10 factual disputes and I am not taking a position on this
 11 factual dispute. I am alerting the panel to the fact
 12 that the evidential position is rather unsatisfactory,
 13 to say the least. Our position is that it is not
 14 necessary for the panel to decide this issue between
 15 these two individuals, but we certainly submit that if
 16 the panel proposes to do so, it should bear in mind that
 17 the evidence is most unsatisfactory in the way that
 18 I have described.

19 Fourthly, returning to the list of concerns and
 20 criticisms which the council accepts, there was
 21 a failure to put in place suitable policies and
 22 procedures. You will recall that in 1991 the Social
 23 Service Inspectorate was critical of the failure of
 24 the council to keep its child protection procedures up
 25 to date. The council accepts that. It was not an

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1 excuse that the council was dealing with other things,
 2 in particular the Langley judgment. So far as internal
 3 policies within Knowl View, again, it is accepted that
 4 prior to Mr Bradshaw's appointment, there was an
 5 inadequate set of internal policies, and we have given
 6 some examples of what should have existed at
 7 paragraph 14.4.

8 So far as the particular incidents are concerned, we
 9 accept that, in the course of the enquiries and
 10 investigations that took place, too much focus was
 11 placed on the Hilton incident in September 1990 and
 12 insufficient focus was placed on the other two aspects
 13 of it: the external exploitation by adults and the
 14 peer-on-peer abuse. There was at times, we readily
 15 accept, a complete failure to treat those latter two
 16 issues with anything like the significance and
 17 seriousness they deserve and to see them as, as it was
 18 put, normal behaviour. The council accepts that it was
 19 not, whether one asks that question in 2017 or 1989.

20 At 14.6 we have set out what we say about the
 21 Rodney Hilton incident. It was treated as isolated when
 22 it wasn't and it shouldn't have been. Social services
 23 were not called in and they should have been. It was
 24 wrong to treat it as a police-only matter because it
 25 concerned outsiders. It was patently evident that

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<p>1 children were at risk of serious harm and that 2 social services should have been involved. 3 We also accept -- I'm conscious of what appears in 4 the GMP's note about this, but we accept, for the 5 reasons given in the note, that it might have been 6 a good idea to apply for some legal protection in 7 respect of Hilton. 8 Smith Street toilets. Evidence in the 9 social services files that individual social workers 10 tried to do their best for children, but it is accepted 11 that management decisions in respect of this were not 12 adequate. 13 In 14.7 the detail is given. We accept there was 14 a failure to treat this with the seriousness it 15 deserved. Again, the social services should have been 16 involved. There was evidence children were at risk of 17 serious harm. And that was not done. 18 There was evidently a failure to understand the 19 risks to children that exploitation of this sort might 20 pose. But we do think it is fair to say, and we have 21 said so at 14.7, that that failure in the late 1980s and 22 early 1990s was probably not unique to Rochdale. One 23 considers the terminology that was used at the time to 24 describe this kind of activity. "Rent boy activity", 25 "cottaging", and language of that sort was commonplace</p> <p style="text-align: center;">Page 21</p>	<p>1 access to relevant information as a result of 2 the communication breakdowns I have already identified 3 and without the sort of joint working between agencies 4 which now characterises contemporary child protection 5 practice. 6 We make the point at 16 that it is an unusual 7 feature of the matters with which this inquiry is 8 concerned that very much of it is documented. This is 9 not a case, and the inquiry I know will find that other 10 aspects of their work do show this, but in Rochdale it 11 is not a case of abuse remaining hidden behind closed 12 doors in secret for many, many years until somebody was 13 brave enough to come forward to say what had happened 14 and then it became investigated. All of -- almost all, 15 it doesn't apply to the Cyril Smith allegations, the 16 Wild allegations and one or two others, but the majority 17 of the abuse with which you have been concerned over the 18 last three weeks is documented. It was known about by 19 the authorities. Similarly, the decisions that were 20 taken by the social care and educational professionals 21 in order to try to deal with it are all set out in 22 documents, social services records, memos, reports and 23 so on under the name of the author. 24 Whilst we accept that those investigations were not 25 adequate, it is not a matter of them being conducted</p> <p style="text-align: center;">Page 23</p>
<p>1 and it does suggest, we submit, a widespread failure to 2 understand that serious exploitation was involved. Nor 3 was it a problem unique to Rochdale and nor was the 4 Smith Street problem unique to pupils from Knowl View. 5 But none of that excuses the failure to take matters 6 sufficiently seriously. 7 So far as peer-on-peer abuse is concerned, well, it 8 is similar points: a failure to understand the 9 seriousness of it; a failure to involve the 10 social services when the statutory threshold was 11 apparently met; wrong, we fully accept, to treat those 12 instances outside the child protection guidelines; wrong 13 not to investigate regardless of that; and wrong to form 14 the view that some children were perpetrators rather 15 than victims without even having interviewed them. 16 In conclusion on Knowl View, we have one more point 17 to make, and it is this: it is not the council's 18 position that any one individual is responsible for what 19 happened. Decisions were taken by social workers, 20 social care and educational professionals, over 21 a significant period of time and we submit were taken in 22 good faith and with the best of intentions and in an 23 effort to act in the best interests of children, as 24 those professionals honestly understood and believed 25 them to be at the time. But they were taken without</p> <p style="text-align: center;">Page 22</p>	<p>1 secretly or people making decisions that they weren't 2 prepared to put on documents that it was perfectly 3 obvious would survive and would be available for future 4 reference. 5 We say all of that supports the submission that, 6 whilst there were significant failings, they were not 7 perhaps the extraordinary examples of dereliction of 8 duty or grossly incompetent management that they were 9 sometimes characterised as in questioning before this 10 hearing. They were errors and misjudgments made by 11 professionals who were acting in good faith, albeit of 12 course we accept in circumstances where the consequences 13 of those errors and misjudgments were exceptionally 14 serious for the children involved, and that is something 15 for which, as I hope we have made clear, the council is 16 truly sorry. 17 I'm not going to say any more about the other two 18 issues that we covered in the note. The first is 19 findings of fact. I said something about it in opening. 20 I'm not aware that anybody is going to ask the panel to 21 make findings, but if they are, our position is set out 22 there. 23 I said in opening that we would submit something in 24 writing about contemporary childcare practice in 25 Rochdale and that is attached to the note. It is</p> <p style="text-align: center;">Page 24</p>

<p>1 a summary of the position prepared by Mrs Hopper, who of 2 course you have heard from. Unless I can assist any 3 further? Thank you very much. 4 THE CHAIR: Thank you, Mr Ford. Ms Hoyano? 5 Closing statement by MS HOYANO 6 MS HOYANO: Thank you, chair. I want to return our focus to 7 the children behind the ciphers. Two of our clients 8 were too unwell to testify, although they desperately 9 wanted to do so. Such was the determination of two 10 others to testify that they overcame formidable 11 obstacles: one who is facing back surgery refused to 12 take, against my advice, his regular dose of morphine 13 because he was afraid that it would affect the clarity 14 of his recall and his account; another had not been 15 downstairs in his own home for 18 months, but insisted 16 on being stretchered down a narrow staircase by 17 ambulance crews to his GP surgery so that he could 18 access WiFi in order to testify. We are grateful that 19 he was able to do so. 20 Their testimony, we suggest, is credible, 21 particularly when the inquiry views it against the 22 backdrop of the evidence of the nature and culture of 23 the institutions in which they were required to live as 24 children. 25 In my opening statement, I asked you to watch for</p> <p style="text-align: center;">Page 25</p>	<p>1 fault. For example, by stealing a bicycle, breaking 2 into a cigarette machine or making life intolerable in 3 their own homes for their families. 4 The disclosure of documents in this investigation 5 and the challenging of many people who made decisions 6 affecting our clients' lives unbeknownst to them has 7 been hugely valuable and that thoroughly justifies this 8 investigation, we submit. 9 We have seen counsel for Rochdale Borough Council 10 candidly accept responsibility for the council's 11 failures, both broadly and in detail, and we thank him 12 and those who instruct him for that clarity. We have 13 also seen the CPS admit errors, albeit in a more 14 nebulous way. These errors lead, we suggest, inexorably 15 to a conclusion that Cyril Smith should have been 16 prosecuted in 1970, in 1998, in 1999 for his abuse of 17 children in Cambridge House on the basis of the law 18 governing those decisions in 1970, 1998 and 1999, and we 19 submit that the inquiry is well placed now to make that 20 finding. 21 Our clients have learned some of the answers behind 22 what happened to them as children when they were dumped 23 at the door of Knowl View, usually bewildered and 24 traumatised, with no idea why they were there, and then 25 subjected to a regimented, institutional environment in</p> <p style="text-align: center;">Page 27</p>
<p>1 the other children in the shadows from Cambridge House 2 and Knowl View. Some tragic figures can now be seen 3 more clearly. For example, A10, A24 and A12, routinely 4 exploited by paedophiles coming from across the north of 5 England to the Smith Street toilets and to flats in 6 Rochdale, Manchester and other areas in order to exploit 7 them. And there is A14, Hilton's victim of what would 8 now be characterised as rape under the Sexual Offences 9 Act 2003, who died on his 20th birthday of a drug 10 overdose. Moreover, there are many others who gave 11 harrowing accounts to the police in the successive 12 enquiries after 2012 but who were not focused on by 13 social services and the Education Department at the 14 time, but who clearly suffered as much, if not even 15 more, from their experiences, particularly at 16 Knowl View. 17 I trust that you were struck by the dignity of 18 the complainants who testified before you and by their 19 candour in telling you of the difficulties in their own 20 lives which had brought them to Cambridge House and 21 Knowl View and what happened in their lives thereafter, 22 some of which appears only in their witness statements. 23 They, unlike the politicians and a few of 24 the professionals who have appeared before you, have not 25 sought to shirk their responsibility when they were at</p> <p style="text-align: center;">Page 26</p>	<p>1 place of a home. But there remain many questions which 2 I placed on the record in my opening statement which 3 have not yet been resolved and which must await the 4 Westminster investigation. Accordingly, we hope for 5 a favourable outcome to our CP applications on behalf of 6 seven of our clients in Westminster, and we hope that 7 the Westminster hearing, at least in relation to 8 Cyril Smith, can be scheduled so that those of our 9 clients who are in very frail health may hope to live to 10 see resolution of all their questions. 11 I turn now to Cyril Smith. There has been no 12 challenge to the evidence before this inquiry that 13 Cyril Smith was a paedophile with a particular interest 14 in young and adolescent boys. Indeed, that is admitted 15 by the borough council, who also admit that Cyril Smith 16 sexually abused the boys in Cambridge House. In 2012, 17 the Greater Manchester Police said the evidence against 18 Cyril Smith was overwhelming. So we submit that it is 19 appropriate for this inquiry to make a finding of fact 20 that Cyril Smith was a paedophile and sexually abused 21 young and adolescent boys in Rochdale. 22 There are, however, at least two major questions 23 which remain outstanding and which can only be answered 24 following the Westminster investigation. First: why did 25 the national and local Liberal Party support</p> <p style="text-align: center;">Page 28</p>

<p>1 Cyril Smith's selection as a prospective parliamentary 2 candidate in the midst of a major police investigation 3 into alleged sexual offending? The evidence adduced 4 before this inquiry shows that the national party agent 5 sent by Jeremy Thorpe to recruit Cyril Smith was 6 directly informed by Rochdale residents of recent 7 complaints of child sexual abuse against Cyril Smith. 8 Secondly, Cyril Smith had told the police he could 9 not stand for selection if the police investigation had 10 not been concluded first in his favour. But 11 nonetheless, he did so before the police file had even 12 been submitted to the Director of Public Prosecutions. 13 We do not know yet how much information Jeremy Thorpe 14 and his Chief Whip, David Steel, and others in the party 15 had regarding the ongoing police investigation. 16 The second major question is how Cyril Smith managed 17 to escape prosecution over 50 years from his first 18 suspected offence in 1960 until his death in 2010. We 19 have seen intriguing evidence from MI5 of contact 20 between the Director of Public Prosecutions and MI5, and 21 MI5 having maintained a dossier on Cyril Smith going 22 back several years before 1979. We also know that 23 Cyril Smith maintained an inexorable rise in the 24 political life, national life and indeed receiving royal 25 honours, even though those involved in facilitating his</p> <p style="text-align: center;">Page 29</p>	<p>1 taken with remarkable rapidity, given the complexity of 2 the evidence which needed to be analysed as well as the 3 applicable law. If I could take you again to 4 paragraph 58 on page 16, you will see that Mr McGill 5 said that: 6 "Based on the limited information available to me, 7 I have concluded that had he [that is at that time 8 thought to be Skelhorn] considered the overall 9 evidential picture, including CS's claims of innocent 10 association, together with the judgments in Sims and 11 Flack, it is difficult to see how he would have come to 12 any other conclusion but that there was indeed 13 corroboration of the complainants' accounts, or at the 14 least a good arguable case that that was the position." 15 In other words, the CPS conceded that the DPP had 16 made a mistake of law. But on the stand, Mr McGill 17 claimed that -- and I quote from the transcript, 18 page 127: 19 "It is difficult to say it was not a reasonable 20 decision based on the confusion of the law at the time." 21 Now, the difficulty for Mr McGill's assertion is 22 that the decision completely ignored the law on similar 23 fact evidence and, moreover, that it was not 24 inconsistent or unclear in any way in 1970 in its 25 specific application to this case. Mr McGill is simply</p> <p style="text-align: center;">Page 31</p>
<p>1 rise knew of the police investigations in 1969 to 1970. 2 We do have information from 10 Downing Street that 3 they knew, at the time that David Steel nominated 4 Cyril Smith, of that investigation. We don't know what 5 advice was given to Mrs Thatcher, but we do know that 6 Sir Robin Butler, as he then was, feared that giving 7 Cyril Smith a knighthood would be embarrassing to the 8 Prime Minister and to the Queen. Nonetheless, he got 9 his knighthood. So that is something we suggest which 10 needs to be further pursued in the Westminster 11 investigation. 12 I turn now to the decisions not to prosecute, and 13 firstly the decision in 1970. For the sake of ease, 14 I am going to refer to the decision by the DPP because 15 it was his office, even if it was by one of his staff 16 lawyers who actually made the decision. 17 I would ask, please, if we could pull up CPS002813. 18 This is a remarkable witness statement by Mr McGill on 19 behalf of the CPS which ultimately said that all three 20 of the decisions of the DPP's office and subsequently by 21 the CPS were, to put it at its lowest, dubious. But in 22 oral evidence, Mr McGill retreated from those positions 23 he had taken in his witness statement. So what he said 24 in his witness statement needs to be revisited. 25 The decision of March 1970. This was a decision</p> <p style="text-align: center;">Page 30</p>	<p>1 wrong about this. 2 A longstanding rule was that charges relating to 3 separate complainants could be combined in the same 4 trial and be made cross-admissible where there was 5 evidence of the defendant deploying a system, or, 6 indeed, there was a second exception -- indeed, there 7 are five -- which Mr McGill actually concedes in his 8 witness statement, to rebut evidence of innocent 9 association, which is what Cyril Smith seemed to claim 10 in asserting in loco parentis. 11 Both exceptions were frequently invoked by the 12 prosecution in relation to sex offences in the 1960s, 13 especially sexual offences against children by adults. 14 In the case he claims to be in conflict, Flack, 15 Lord Justice Salmon confirms these exceptions. For the 16 lawyers on the panel, I direct you to page 943 of 17 the Weekly Law Reports. When asked about this exception 18 in evidence, it appears that Mr McGill did not 19 understand the case which he himself had cited in his 20 witness statement. Now, here we suggest we have 21 a paradigm case of a system being deployed by 22 a paedophile. 23 Firstly, Cyril Smith attending the 24 Children's Committee even when he was not a member and 25 doorstepping families to identify the most vulnerable</p> <p style="text-align: center;">Page 32</p>

1 boys to place in Cambridge House.
 2 Secondly, summoning them to a private room for an
 3 interview often arranged by Mr or Mrs Sailles, the
 4 wardens.
 5 Thirdly, fondling genitals and stroking the boys'
 6 bodies under the guise of a medical examination.
 7 Fourthly, requiring the boys to strip naked and
 8 submit to spanking on their bare bottoms under the guise
 9 of corporal punishment, threatening them that if they
 10 did not submit, they would be expelled from
 11 Cambridge House and made homeless.
 12 Moreover, the decision also ignores two very
 13 important facts in the dossier provided to the DPP.
 14 Firstly, Cyril Smith did not allege that the boys were
 15 in a conspiracy to fit him up. On the contrary, he
 16 specifically denied that.
 17 Secondly, Cyril Smith did not allege that the boys
 18 were lying about what had happened to them. He
 19 volunteered that they were telling the truth as they saw
 20 it. So in legal terms, he never denied the acts
 21 comprising the medical examinations and corporal
 22 punishment. Then he refused to comment on any of
 23 the specific allegations by the complainants.
 24 He claimed that what had happened was protected by
 25 the doctrine of in loco parentis, that he was standing

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1 in the place of parents. Now, this was a quintessential
 2 issue, a legal issue, for the DPP to address. It should
 3 have been to consider whether it was a complete defence
 4 to what had happened, but we see no reference to it
 5 whatever in the decision letter.
 6 We say that the bogus medical examinations could not
 7 possibly be justified by this doctrine. No father could
 8 carry out repeated manual examinations of his
 9 15-year-old's genitals in order to ascertain whether
 10 they had, for example, a hernia. These constituted
 11 indecent assaults in 1960 to 1965. Similarly, we say
 12 the same applies to corporal punishment administered on
 13 naked bodies, especially given the massaging and
 14 stroking of the boys' bodies thereafter. They cannot be
 15 justified by the doctrine of in loco parentis.
 16 We say that these would have been two very powerful
 17 points to place before a jury.
 18 Given that Cyril Smith did not deny what happened,
 19 the suggestion that the boys would not be believed
 20 because of their characters then completely falls away.
 21 But none of this was considered by the DPP's office.
 22 In conclusion, the decision was clearly unreasonable
 23 because it was clearly wrong in law on at least two
 24 aspects. It was a strong case by the standards of
 25 the time, as pointed out by the very senior Lancashire

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1 police investigators.
 2 Turning to the subsequent decisions not to prosecute
 3 in 1988, 1989 and also the 2012 review, I can take these
 4 together. We say that Cyril Smith should have been
 5 charged and that a trial judge, having seen the evidence
 6 and having heard submissions from the CPS and from
 7 defence counsel for Smith, should have had the
 8 opportunity to rule on any abuse of process application
 9 to stay the prosecution. Moreover, given the type of
 10 decision whereby a trial judge must make an evaluative
 11 assessment of whether the court's process was being
 12 abused by the prosecution, it should not have been left
 13 to a comparatively low-level prosecutor to decide to
 14 take that evaluation away from the court, especially in
 15 respect of such a high-profile individual.
 16 As noted by Mr McIntosh, the Branch Crown Prosecutor
 17 was in effect being asked to review a decision which, so
 18 far as he knew, had been taken by the DPP himself, given
 19 its importance at the time in 1970.
 20 Again, the BCP -- Branch Crown Prosecutor -- makes
 21 basic errors about corroboration by saying there was
 22 "a lack of corroboration for any of the boys' accounts".
 23 If you could please pull up on the same document
 24 paragraph 105 on page 29. Here we see:
 25 "In other respects, [the Branch Crown Prosecutor's]

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1 approach to 'corroboration' of the complainants'
 2 accounts (he said there was none) is open to
 3 criticism..."
 4 Then going on to paragraph 108, please. Therefore,
 5 according to Mr McGill in this paragraph, the analysis
 6 in 2012 by a Senior Crown Advocate that the Branch Crown
 7 Prosecutor's advice "'cannot be faulted' is not wholly
 8 accurate; there are criticisms that can properly be made
 9 of the approach by [the Branch Crown Prosecutor] in
 10 1998/'99."
 11 That appears in the witness statement. But on the
 12 stand Mr McGill sought to excuse these decisions by
 13 trying to reinterpret the BCP's advice as using loose
 14 legal language saying that there was no evidential
 15 corroboration.
 16 Now, this is pure speculation that this is what he
 17 meant. We were not given the opportunity to question
 18 this officer from the CPS whom we had requested be
 19 summoned to testify as to what his understanding was of
 20 the law.
 21 In any event, legal advice should never misuse legal
 22 terminology. For one thing, it is confusing to the
 23 police officers seeking the advice who can be expected
 24 to learn from and rely upon it in other cases.
 25 To say the least, it is sloppy and it instills

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<p>1 a lack of confidence in the judgment of this lawyer in 2 making the decision not to prosecute because of 3 the prospect that Smith would fight the case on the 4 basis of abuse of process. 5 Moreover, his reference to the risk of this becoming 6 a political show trial, which is my words, but in effect 7 a paraphrase of what he said, shows that this was not 8 just a routine advice and that extra care was required. 9 This makes it all the more perplexing that the decision 10 was not referred to CPS headquarters in London or at 11 least to a higher level than it was. 12 It is true that the initial draft advice in 1998 did 13 go to one step higher, but we submit it should have gone 14 much higher. 15 In evidence, moreover, Mr McGill admitted that the 16 BCP had made no analysis of the arguments which could be 17 made against Smith in an abuse of process application. 18 There was no analysis of the countervailing public 19 interest factors in favour of a prosecution. Instead, 20 he cited only those upon which Smith might rely. So 21 there was no proper analysis on the papers of 22 the strength of the abuse of process argument to be seen 23 in that decision. 24 On the face of it, it was an unbalanced decision. 25 Mr McGill has admitted that there is no evidence of</p> <p style="text-align: center;">Page 37</p>	<p>1 factions, and with no effective safeguarding measures in 2 place. I will just say this: these lonely and lost boys 3 were easy prey for paedophiles. It was a highly 4 peculiar environment, disorienting to boys desperate for 5 human contact, care and affection. To appreciate this, 6 one only has to point to the fact that a year after 7 Hilton had sexually assaulted A14, Hilton was quoted as 8 being "very much part of school life". I refer you to 9 RHC001956. 10 I want to acknowledge the strenuous and 11 conscientious efforts of Councillors Moffat and Hawton 12 and the officers Diana Cavanagh, Janet Bowyer/Weeks, 13 Dr Alison Fraser, Christine Scarborough and 14 Stephen Bradshaw who strove to deal effectively with the 15 serious problems at Knowl View once they became aware of 16 them. They were hindered in their efforts by corporate 17 lassitude, including by social services, a lack of 18 resources and support from the council and some 19 uncooperative staff at Knowl View itself, and by 20 a Director of Social Services and a superintendent of 21 police responsible for child protection who preferred to 22 abide by their own restrictive and we say unreasonable 23 interpretations of non-statutory guidance and to avert 24 their eyes from the children who were being abused. 25 The consequences of what amounted to obstruction by</p> <p style="text-align: center;">Page 39</p>
<p>1 analysis of the countervailing considerations on 2 page 162 of his transcript. 3 Now, today this would provide fertile ground for an 4 application for judicial review of the decision not to 5 prosecute. 6 In summary, there has been a highly significant 7 climbdown from the climbdown by the Crown Prosecution 8 Service in the course of these hearings -- not once, but 9 four times. The CPS now seems to be defending the 10 decisions not to prosecute Cyril Smith, whereas in the 11 witness statement of 8 September 2017, Mr McGill 12 identified significant errors at each stage and openly 13 acknowledged them. 14 Relative clarity in admitting errors has declined to 15 equivocation and then to denial. On behalf of 16 the complainants, we wish to record our deep 17 disappointment and bafflement at these changes of 18 position. 19 I wish now to go on to responsibility for failings 20 at Knowl View. Given the highly significant and very 21 welcome admissions of responsibility made by the borough 22 council in relation to its officials, I will not dwell 23 upon the catalogue of failings which left these boys to 24 languish in a squalid building with little or no 25 productive education, with staff divided into warring</p> <p style="text-align: center;">Page 38</p>	<p>1 omission is that the boys continued not to be protected 2 from exploitation outside the school and the victims of 3 sexual abuse did not receive any counselling or therapy 4 so that the trauma they had suffered continues to this 5 day. 6 I also wish to acknowledge the high degree of 7 professionalism and expertise shown by Ms Gail Hopper in 8 her testimony and in her comprehensive report. Rochdale 9 Council is extremely fortunate to have her in charge of 10 children's services. 11 All of those public servants I have named are 12 conscientious and highly professional and they genuinely 13 care about children. They gave their evidence with 14 candour, admitting fault where it was warranted. 15 Unfortunately, the same cannot be said for the leaders 16 of the council, Richard Farnell and Paul Rowen. Here 17 the inquiry has witnessed a complete abdication of 18 leadership and responsibility. They were elected 19 representatives of the people of Rochdale Borough, but 20 considered themselves to be unaccountable for the 21 council's errors; instead, they blame their officers. 22 In reverse order, Paul Rowen. A councillor from 23 1983 to 2007, leader of the opposition 1990 to 1992, and 24 leader of the council 1992 to 1996. He testified before 25 you that he had said to one chief officer, "I will give</p> <p style="text-align: center;">Page 40</p>

<p>1 you the problems. I expect you to find the solutions".</p> <p>2 That is transcript page 188. That's a remarkable</p> <p>3 statement.</p> <p>4 He claimed that he knew nothing about Knowl View</p> <p>5 before taking office as leader, although his claim that</p> <p>6 reserved business was not circulated to opposition</p> <p>7 members committees, including the Policy Committee, has</p> <p>8 been disproved by the standing orders that we have just</p> <p>9 had produced in the last two days.</p> <p>10 He declined to read any papers regarding Knowl View</p> <p>11 which had been offered to him in his first week in</p> <p>12 office because he thought, wrongly, that the problems</p> <p>13 were historic. So he expected Ian Davey to deal with</p> <p>14 child sexual exploitation at Knowl View and never</p> <p>15 followed up to see if it had been, and we know it was</p> <p>16 not.</p> <p>17 He appointed Cyril Smith to be a governor of</p> <p>18 Knowl View because it suited him personally in order to</p> <p>19 get him off his own back and to stop him from being, in</p> <p>20 his words, a back-seat driver with council business,</p> <p>21 giving Cyril something to do once he had left</p> <p>22 parliament. This is notwithstanding that from the RAP</p> <p>23 article in 1979, which he admitted having read, he knew</p> <p>24 that Smith had been investigated for child sexual abuse.</p> <p>25 I turn now to Richard Farnell. Bizarrely, he</p> <p style="text-align: center;">Page 41</p>	<p>1 deputy leaders and the chairs of committee if their</p> <p>2 business was to be discussed. I refer you to the</p> <p>3 transcript at pages 185-6.</p> <p>4 Mr Farnell basically confirmed the structure</p> <p>5 although he said it met less frequently: twice every six</p> <p>6 weeks.</p> <p>7 In addition, Mr Farnell established a committee</p> <p>8 chairs' panel which met about twice during that cycle to</p> <p>9 address problems. Diana Cavanagh testified about</p> <p>10 regular meeting with the chief executive officer who in</p> <p>11 effect served as a funnel to help the leader prioritise</p> <p>12 issues.</p> <p>13 Secondly, we know that Councillor Moffat was very</p> <p>14 close to Richard Farnell and she was deeply concerned</p> <p>15 about Knowl View. In fact, she was telephoned on the</p> <p>16 weekend of the Hilton incident by the school even before</p> <p>17 the Director of Education was informed. She was,</p> <p>18 according to Mrs Cavanagh, very, very well briefed about</p> <p>19 Knowl View and she had an office very near to</p> <p>20 Mrs Cavanagh. This is her transcript, pages 134-5.</p> <p>21 It is inconceivable that Councillor Moffat, who</p> <p>22 sadly is now deceased, as deputy leader and as the chair</p> <p>23 of the Education Committee, would not have informed her</p> <p>24 party leader of a matter so critical, particularly with</p> <p>25 the Middleton scandal ongoing.</p> <p style="text-align: center;">Page 43</p>
<p>1 insisted before you that in the midst of the Middleton</p> <p>2 scandal, which received international publicity, he did</p> <p>3 not become more vigilant about what other problems in</p> <p>4 Rochdale might beset the council. We know from</p> <p>5 Sir Malcolm Evans' question to Gail Hopper that at</p> <p>6 precisely the same time the council was having to deal</p> <p>7 with the sexual offences committed by a paedophile,</p> <p>8 Anthony Andrews, who was a staff member in a children's</p> <p>9 home in the borough, the Middleton scandal and</p> <p>10 Roderick Hilton. So if it is true that Farnell did not</p> <p>11 adopt a more vigilant approach to council business as</p> <p>12 a consequence of the Middleton debacle, that shows, we</p> <p>13 submit, an extraordinary dereliction of duty.</p> <p>14 The question arises: how could the leaders of</p> <p>15 the council not know of the problems of Knowl View? Was</p> <p>16 it a lack of reporting structure whereby problems could</p> <p>17 be escalated to an appropriate level? Well, there are</p> <p>18 certainly three strands of evidence before the inquiry</p> <p>19 showing that there was a reporting system. Mr Rowen</p> <p>20 testified that he inherited a system from Farnell, which</p> <p>21 he continued, of a weekly meeting on Thursday afternoon</p> <p>22 with the leader, the chief senior officers and the</p> <p>23 senior councillors to discuss any pressing business. It</p> <p>24 was always attended by the chief executive officer, the</p> <p>25 Borough Treasurer, the Borough Solicitor and the two</p> <p style="text-align: center;">Page 42</p>	<p>1 Thirdly, Mrs Cavanagh testified that the</p> <p>2 commissioning of the report from Mrs Mellor and the</p> <p>3 appointment of a head teacher at Knowl View had to go</p> <p>4 through the Policy and Resources Committee chaired by</p> <p>5 Mr Farnell because it involved financial expenditure,</p> <p>6 which is basically off budget, so the background would</p> <p>7 have to be explained to justify it.</p> <p>8 In relation to the Mellor Report, she said that she</p> <p>9 "could not imagine" that it could be commissioned</p> <p>10 without the leader's knowledge because there would be</p> <p>11 financial consequences.</p> <p>12 So in addition to the minutes of 4 April, about</p> <p>13 which you have heard a considerable amount, there are</p> <p>14 three more links here to knowledge by Mr Farnell.</p> <p>15 Mrs Cavanagh had no motivation to lie to this inquiry.</p> <p>16 On the contrary, she was candid in acknowledging her own</p> <p>17 failings and did not attempt to evade any personal</p> <p>18 responsibility. So to conclude, there was a system in</p> <p>19 place; there had to have been a catastrophic failure of</p> <p>20 that system for Farnell not to know about Knowl View.</p> <p>21 Moreover, Mr Farnell told Mr Frank in answer to</p> <p>22 a question that he had changed the system now that he's</p> <p>23 back in office as leader of the council, so this could</p> <p>24 never happen again under his watch.</p> <p>25 Well, if that is the case, he could, and should,</p> <p style="text-align: center;">Page 44</p>

<p>1 have done so in the period of 1988 to 1992. His failure 2 to do so, on his own account, would also be culpable. 3 We submit that it is extremely implausible that 4 Farnell knew nothing about Knowl View. He is, in 5 effect, exploiting the multiple losses of 6 Rochdale Council records, of which you have heard 7 evidence, to assert, as council to the inquiry put it, 8 complete and utter ignorance of what was happening under 9 his nose. This is not an excuse. 10 Finally, we have the evidence of the Labour 11 Chief Whip, Mr Joinson. This is direct evidence that 12 Farnell admitted to knowing about the Knowl View problem 13 through having seen the Shepherd Report and the 14 Mellor Report in draft form before he lost his seat in 15 1992. We submit that the evidence of Mr Joinson should 16 be preferred by the panel and accepted as the truth for 17 several reasons. 18 Firstly, Farnell admits that the meeting did occur 19 on 11 April 2014. Whatever the reason for the meeting 20 having -- whatever the reason for the two men having met 21 up, they met. 22 Secondly, Joinson took contemporaneous notes, 23 Farnell did not. Those notes recorded significant 24 admissions by Farnell which Farnell might well have 25 regretted making afterwards.</p> <p style="text-align: center;">Page 45</p>	<p>1 the face of the document does not directly contradict 2 the evidence of Mr Joinson, but, as I say, this was 3 a peripheral issue compared with the points I have 4 otherwise made. 5 Consequently, we submit that it is open to this 6 inquiry to find that Mr Farnell did not give truthful 7 evidence that he did not know about endemic child sexual 8 abuse at Knowl View. If he didn't know, then he must 9 have been wilfully blind. The systems of communication 10 between officers and councillors was set up, as the 11 evidence shows. Regrettably, we cannot ask 12 Councillor Moffat about discussions she had with the 13 leader because she is now deceased, and Mr Pierce was 14 medically unfit to testify, but the statement he gave to 15 police was contradictory and consequently, we say, 16 unreliable. 17 We have heard Mr Farnell being described by several 18 witnesses as being intimidating and indeed a bully. 19 The officers had no motive personally to keep such 20 damaging information from Mr Farnell. He, on the other 21 hand, potentially had a motive of deniability. It could 22 be helpful to him, arguably, if he ensured that he 23 didn't know inconvenient truths. 24 If that is the case, that constitutes wilful 25 blindness and that, we submit, constitutes a coverup at</p> <p style="text-align: center;">Page 47</p>
<p>1 Thirdly, although the two men were political 2 enemies, which was pointed out by Mr Farnell, Mr Joinson 3 did not use the admissions by Farnell as a political 4 weapon for his own purposes. Instead, he discreetly 5 informed regional officers of the Labour Party of 6 the problem in accordance with his duty as Chief Whip. 7 Therefore, the malicious motive attributed by Farnell to 8 Joinson is not borne out by the evidence; rather, it is 9 contradicted by it. 10 Fourthly, Joinson did not disclose Farnell's 11 admissions to anyone other than Labour officials, who 12 were entitled to know about them, until the police 13 commenced their investigation into collusion, at which 14 time he properly informed the police. 15 Now, I turn to the peripheral issue of why the 16 meeting was set up. I would simply point out that if 17 you look at page 10 of a document which has now been 18 produced, which were the minutes of the meeting 19 of April 4 of the council, you will see that the major 20 posts were filled -- the leader, chairs of committees 21 and the membership of major committees -- but it shows 22 that many other more minor appointments remained to be 23 made. 24 So it may be that the evidence is now in an 25 unsatisfactory state, but I suggest that what you see on</p> <p style="text-align: center;">Page 46</p>	<p>1 the level of the leadership of the borough council. 2 Finally, chair, if I might turn briefly to the 3 lessons for the future which my clients have asked that 4 we place before this inquiry. 5 First: listen to children. The decisions by 6 social services and the police not to interview the 7 children is utterly perplexing. This came after the 8 Cleveland report where Mrs Justice Butler-Sloss pointed 9 out that children must not be treated as objects of 10 concern. This is how the boys at Knowl View were 11 treated at best by the authorities. It was impossible 12 to get even an inkling of the full extent of the problem 13 without speaking to the children, especially as the 14 school staff were in a state of denial. 15 Secondly, don't treat victims as perpetrators. 16 Thirdly, don't criminalise children and then 17 criticise them for not cooperating with the police in 18 prosecuting their abusers. Here I would refer you to 19 page 51 of the Operation Clifton report, referring to, 20 and I quote, "the reluctance of victims to speak to the 21 police and social services" as apparently being a factor 22 in hindering effective steps being taken by the police 23 to deal with Smith Street toilets. 24 How could this be a sensible strategy, to expect the 25 victims of child sexual exploitation to cooperate with</p> <p style="text-align: center;">Page 48</p>

1 the police when they were cautioned or charged with
2 criminal offences connected with that very exploitation;
3 but the adults did not, when the children did cooperate
4 with the police. In effect, this was victim blaming.
5 When the obligation lay on the police to conduct an
6 effective investigation including proper surveillance so
7 as to arrest and charge the perpetrators at the
8 Smith Street toilets.
9 We saw this attitude again in 2008 in the case of
10 Girl A in the Rochdale child sexual trafficking cases
11 where she was charged with criminal damage when she
12 broke up a kebab shop which was a place from which she
13 was being trafficked.
14 I entirely accept that Greater Manchester Police is
15 now a beacon of good practice in dealing with child
16 sexual exploitation, but I fear that it is entirely
17 possible that this attitude of criminalisation may still
18 persist in parts of the country and it would be very
19 helpful, I believe, for the inquiry to address this
20 issue.
21 Fourthly, try to understand the dynamics of
22 child-on-child abuse. It is likely that the so-called
23 abuser was the so-called abused, either in his past or
24 present life.
25 Fifthly, bravado and misbehaviour can conceal

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1 vulnerability and significant underlying problems.
2 Sixthly, yes, the culture of child protection since
3 Knowl View has changed in England and Wales, but
4 cultures are transient, as we have seen recently with
5 the endemic abuse of the elderly in residential care
6 homes. It all depends on ongoing training. Constant
7 vigilance is required and there is no room for
8 complacency. In particular, guidance is not enough. We
9 have enough guidance. Guidance must be lived in all
10 dealings by professionals with children, not just lie on
11 a page. Its precepts must be experienced by children,
12 not just reside in warm and comforting rhetoric in that
13 guidance.
14 For example, we have seen that the Ministry of
15 Education guidance requiring a designated teacher for
16 child protection in schools was of no value if that
17 teacher did not see the abuse happening in front of him
18 or her or did not know how even to report it to
19 social services. So the rule requiring a designated
20 child protection teacher meant nothing at Knowl View.
21 Seventhly, no institution with responsibility for
22 children should be "left to run itself by its own
23 rules". I'm quoting here from the Hodge and Dobie
24 report, GMP000373.
25 Finally, an extremely important lesson to be learned

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1 is, it is essential to take corporate and personal
2 responsibility for mistakes and to do so in a timely way
3 before being forced to do so by a public inquiry
4 convened decades later.
5 So in conclusion, looking back, we see the past
6 alive in the present for the men who have testified
7 before you. Their continued suffering is palpable. We
8 see the appalling consequences of not acting at all or
9 of acting ineffectually.
10 Mrs Cavanagh made a moving apology to the children
11 of Knowl View for her own failings as Director of
12 Education. It is deeply regrettable that no politician
13 appearing at this inquiry has seen fit to apologise.
14 This happened on their watch. We submit on behalf of
15 the victims of Knowl View that they should be held
16 personally accountable by this inquiry. Thank you,
17 chair.
18 THE CHAIR: Thank you, Ms Hoyano.
19 MR ALTMAN: Chair, thank you. It is time for your break.
20 Before you do, just one very small thing, and I am
21 sure Ms Hoyano will agree with me: when she referred to
22 the meeting between Farnell and Joinson, I think she
23 used the date 11 April; she meant 11 June.
24 MS HOYANO: My apologies, that's correct.
25 THE CHAIR: Thank you, Mr Altman. We will return at

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1 12.05 pm.
2 (11.50 am)
3 (A short break)
4 (12.09 am)
5 THE CHAIR: Mr Payne?
6 Closing statement of MR PAYNE
7 MR PAYNE: The inquiry has heard first-hand from some of
8 those who were subjected to abuse at the hands of,
9 amongst others, Cyril Smith. These victims have shown
10 great courage and great dignity in the way they have
11 come forward and given their accounts. The Chief
12 Constable of Lancashire wishes to express his deepest
13 sympathies to those who have suffered abuse and who have
14 had to wait so many years to have the actions of their
15 abusers brought to public scrutiny. It is hoped that
16 the inquiry, by exploring and exposing the failures in
17 the systems that should have protected them better, has
18 provided some measure of comfort to those who were
19 abused.
20 This inquiry was set up to identify ways of
21 improving the safeguarding systems that protect our
22 children today and in the future. To achieve this task,
23 the inquiry is investigating various historical
24 incidents of abuse where state institutions may have let
25 down children, the children they were supposed to

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<p>1 protect.</p> <p>2 As the terms of reference make clear, a significant</p> <p>3 focus of the inquiry will be on identifying failures in</p> <p>4 the response to situations where children have been</p> <p>5 harmed in the past. But of course identifying failures</p> <p>6 is only one way of understanding where improvements need</p> <p>7 to be made. Another factor, and the chief constable</p> <p>8 would say an equally relevant consideration, lies in</p> <p>9 looking to see where the actions of state institutions</p> <p>10 did provide proper protection to children.</p> <p>11 Acknowledging the positives as well as the negatives</p> <p>12 is important. Inevitably, the action of many state</p> <p>13 institutions will be subject to criticism by this</p> <p>14 inquiry. Whilst the improvements that have been put in</p> <p>15 place since the events will be acknowledged, given the</p> <p>16 nature of the media, it is inevitable that the focus of</p> <p>17 reporting will be on the failings of institutions. This</p> <p>18 is certainly the approach taken by the media when</p> <p>19 reporting the previous case study undertaken by the</p> <p>20 inquiry.</p> <p>21 A constant stream of reports of failings risks</p> <p>22 undermining public confidence in the very institutions</p> <p>23 that people need to be able to trust if those</p> <p>24 institutions are to be able to provide effective</p> <p>25 protection to the vulnerable.</p> <p style="text-align: center;">Page 53</p>	<p>1 obstruction, and their work was characterised by an</p> <p>2 enlightened understanding of the dynamics of</p> <p>3 the power/vulnerability imbalance which silences</p> <p>4 victims. We say that this investigation was exemplary,</p> <p>5 not only by the standards of 1970, but also by the</p> <p>6 standards of 2017. Those senior officers made a very</p> <p>7 strong recommendation to the DPP that Cyril Smith be</p> <p>8 charged with sexual offences against eight young men</p> <p>9 whilst they were boys."</p> <p>10 Lancashire Police is very grateful to the victims</p> <p>11 for making this public statement of confidence in their</p> <p>12 investigation. It means a great deal to Lancashire</p> <p>13 officers who work with children and provides them with</p> <p>14 a powerful motivation to continue striving to provide</p> <p>15 children and others who are vulnerable with the best</p> <p>16 possible protection.</p> <p>17 Turning now to the evidence heard during this</p> <p>18 three-week hearing about the investigation into</p> <p>19 Cyril Smith and Cambridge House. It is significant that</p> <p>20 whilst the Lancashire investigation has been subject to</p> <p>21 rigorous scrutiny by the inquiry, there has been no</p> <p>22 suggestion of any criticism of the steps that were</p> <p>23 taken. This is consistent with the fact that the</p> <p>24 evidence before the inquiry establishes that no aspect</p> <p>25 of the complaints were considered off limit to the</p> <p style="text-align: center;">Page 55</p>
<p>1 There is little point in improving safeguarding</p> <p>2 systems if the people the systems are designed to</p> <p>3 protect are reluctant to approach those who operate the</p> <p>4 systems.</p> <p>5 It is for this reason that the chief constable says</p> <p>6 it is important to report examples where children who</p> <p>7 have sought protection have been listened to and have</p> <p>8 been supported. This balances out the reports of</p> <p>9 mistakes and shows that where the dangers faced by</p> <p>10 children are properly understood, those who wish to</p> <p>11 complain of abuse or raise concerns can be confident in</p> <p>12 receiving compassionate and caring support.</p> <p>13 An unusual feature of this case study is that those</p> <p>14 who represent the victims who gave evidence in this</p> <p>15 inquiry have been the most vocal in acknowledging the</p> <p>16 quality of Lancashire's investigation.</p> <p>17 Ms Hoyano will forgive me if I repeat in full what</p> <p>18 was said on behalf of the victims:</p> <p>19 "Lancashire Police launched a police investigation</p> <p>20 which we say was exemplary. It was thorough. It was</p> <p>21 fearless in the face of threats, intimidation and</p> <p>22 obstruction by Cyril Smith and his political allies,</p> <p>23 including from the leader of the local Liberal Party.</p> <p>24 The police investigation was transferred to very senior</p> <p>25 police officers, given this intimidation and</p> <p style="text-align: center;">Page 54</p>	<p>1 investigators. A good example of this is the response</p> <p>2 to the information that came to light during the</p> <p>3 investigation that a senior social worker,</p> <p>4 Mr Lyndon Price, may have raised concerns in 1965 with</p> <p>5 Patrick Ross, the then Chief Constable of</p> <p>6 Rochdale Borough Police.</p> <p>7 Although this allegation related to events said to</p> <p>8 have taken place many years before the 1969</p> <p>9 investigation, and indeed before Lancashire Police</p> <p>10 became responsible for Rochdale, steps were nevertheless</p> <p>11 taken to ask Mr Ross what he remembered. As it</p> <p>12 transpired, Mr Ross had no recollection of Mr Price</p> <p>13 raising with him these concerns. But what the example</p> <p>14 shows is the commitment of the investigating officers to</p> <p>15 chase down leads and the time and resources that were</p> <p>16 allocated to fully investigating the complaints made</p> <p>17 against Cyril Smith.</p> <p>18 As for the investigation itself, we know now that</p> <p>19 there were, broadly speaking, two parts of</p> <p>20 the investigation. The first was between</p> <p>21 10 October 1969 and January 1970, and for most of this</p> <p>22 period the investigation was progressed by</p> <p>23 a Sergeant Brierley. The inquiry has seen the detailed</p> <p>24 report that he submitted on 31 December 1969. By then,</p> <p>25 a number of complainants and witnesses had been traced</p> <p style="text-align: center;">Page 56</p>

1 and interviewed, and this report, submitted to the Chief
2 Superintendent of Rochdale, was then passed on to the
3 Chief Constable of Lancashire with a strong
4 recommendation that the investigation continue.
5 This led to the second part of the investigation,
6 which was carried out by a specialist team made up of
7 Lancashire's most experienced investigators.
8 Taking a step back now and looking at the totality
9 of the investigation, the key matters that emerged from
10 the evidence were as follows: Cyril Smith did not have
11 a good relationship with the police; the police were all
12 too aware of the high standing that Cyril Smith had in
13 the local political and social circles and the strong
14 hold he had over people in the town, including
15 influential people. This led the police to take steps
16 to keep the investigation as discreet and confidential
17 as possible, warning each person interviewed that the
18 enquiry was strictly confidential and not to be
19 discussed.
20 We know also that, despite these steps,
21 by January 1970, Cyril Smith had come to know of
22 the investigation, and then he went to speak to the
23 police on a sort of fishing expedition to find out what
24 the allegations were.
25 We know that during this meeting with the officers

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1 he was asked whether he said that the boys were lying,
2 and we know that he said, "No, I'm not saying that.
3 They are telling the truth as they see it".
4 During the investigation, eight complainants, six of
5 whom had resided at Cambridge House, were traced. These
6 complainants all gave similar accounts that, under the
7 pretence of carrying out medical examinations or
8 punishing them, Cyril Smith had touched them intimately
9 or spanked them on their bare behinds.
10 We also know that, despite having been given prior
11 notice of what these complainants were saying he had
12 done, in his prepared statement Cyril Smith provided
13 just before being interviewed he did not respond to the
14 allegations made by the individual complainants.
15 Instead, he denied in general terms any indecent contact
16 and raised an in loco parentis defence. We know some of
17 the staff at Cambridge House were interviewed and they
18 made it clear that there was no justification in
19 Cyril Smith performing medical examinations.
20 When interviewed, Cyril Smith declined to answer
21 questions put to him about the individual allegations
22 and relied on his statement. We also know that by the
23 end of the enquiry, Superintendent Leach, having
24 reviewed all the material, provided a detailed report
25 which the inquiry has seen. This provided a balanced

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1 assessment of the strengths and weaknesses of the case
2 and came down to a clear conclusion. As for
3 Cyril Smith, we know that Superintendent Leach was
4 highly disparaging of his response to the allegations,
5 referring to him as a highly unimpressive witness who,
6 were he ever to be placed in the witness box, would be
7 at the mercy of any competent counsel.
8 He was equally unsparing in his view as to whether
9 Cyril Smith had a case to answer. He said:
10 "It seems impossible to excuse his conduct. Over
11 a considerable period of time, whilst sheltering beneath
12 a veneer of respectability, he has used his unique
13 position to indulge in a sordid series of indecent
14 episodes with young boys to whom he had a special
15 responsibility."
16 This report, together with the police file
17 containing some 88 documents, was sent to the Director
18 of Public Prosecutions under cover of a letter dated
19 13 March 1970.
20 So all the evidence that has been put before you
21 points to a thorough, exhaustive and fearless
22 investigation into the allegations made against
23 Cyril Smith. It bears out, we say, the confidence
24 expressed by the victims as to the manner in which their
25 complaints were investigated. Lancashire Police is

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1 grateful to the inquiry for having subjected the force's
2 investigation to such a thorough scrutiny and it is
3 hoped that it has served to allay the rumours that
4 Cyril Smith's influence and public profile meant that
5 the investigating officers were reluctant to investigate
6 the complaints of abuse.
7 The investigation documents you have seen record
8 a willingness to be critical of Cyril Smith and a strong
9 desire to see him held to account for his actions, which
10 is completely inconsistent with any suggestion of
11 deference being shown to him.
12 It is also hoped that this inquiry has served to
13 allay the speculation triggered in large part by the
14 allegations made in Simon Danczuk's book and the
15 Channel 4 Dispatches programme aired in 2013 that the
16 police force's investigation was in some way impeded.
17 It is absolutely clear that the rumours that
18 Special Branch officers or MI5 officers may have taken
19 evidence gathered by the force to frustrate the
20 investigation are baseless.
21 The undoubted vigour with which the investigation
22 was prosecuted, the nature of the material presented to
23 the DPP and the unsparing criticisms of Cyril Smith
24 expressed by those investigating him establish, we say,
25 beyond a shadow of doubt, that there was no coverup.

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1 In conclusion, Lancashire's investigation in 1969
2 and 1970 took place in an era where the frameworks for
3 safeguarding children from sexual abuse were far less
4 robust than is the case today, and there was far less
5 understanding of the risks and prevalence of sexual
6 abuse. The difference in approach was highlighted by
7 the evidence introduced through Ms Hopper as to the
8 sentences given by the courts in the 1970s, 1980s and
9 1990s to those convicted of indecent assault. You will
10 recall that those sentences included fines of £75,
11 community sentences and suspended sentences for crimes
12 that today would undoubtedly attract significant
13 custodial sentences.

14 Considered against this background, we say that the
15 investigation by Lancashire Police was enlightened, if
16 not pioneering, by the standards applicable of the day.
17 Certainly the commitment of the officers who
18 investigated cannot be doubted, a commitment that the
19 Lancashire officers continue to show in investigating
20 allegations of abuse that are brought to their attention
21 today. Thank you.

22 THE CHAIR: Thank you, Mr Payne. Mr Brown?
23 Closing statement by MR BROWN
24 MR BROWN: Chair and members of the panel, can I echo many
25 of the sentiments just expressed by Mr Payne at the

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1 beginning of his address. But as the hearing has
2 progressed, the evidence relevant to your terms of
3 reference has become perhaps more focused. You may
4 think that the only involvement in reality of the CPS,
5 I emphasise, relevant to those terms of reference is
6 that concerning the 1998/99 decision by the Branch
7 Crown Prosecutor in respect of Smith and
8 Cambridge House, and the CPS, by way of the Director of
9 Legal Services, Mr McGill, has, we submit, and I hope
10 you will agree, provided what is an objective analysis
11 of that decision about which I shall address you later.
12 We will go to particular parts of his statement and his
13 evidence.

14 The paragraphs -- you don't need reminding, of
15 course -- of your terms of reference relevant to the
16 Crown Prosecution Service are, and I paraphrase, the
17 extent to which prosecuting authorities, as well as
18 others, of course, were aware of allegations of sexual
19 abuse concerning children who resided at Cambridge House
20 or Knowl View and failed to take appropriate steps in
21 response to it; and, secondly, whether any public
22 authority, which would of course include the prosecuting
23 authorities, whether there was any inappropriate
24 interference in law enforcement investigations or
25 prosecutorial decisions in relation to the abuse.

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1 Given the 1970 role that this had in this inquiry,
2 the role it had in the 1998/99 CPS decision, and
3 because the Crown Prosecution Service had been asked to
4 provide what is a legal commentary only upon it, I will
5 address you in respect of that advice emanating from the
6 Skelhorn office in 1970. I hope I can take it
7 relatively shortly because the information is there
8 before you.

9 As you know, the CPS has conducted as much research
10 as it could from that period to cast some light on the
11 advice of 1970, some 16 years before the CPS was born.
12 For that reason, much of what has been obtained is
13 documentary evidence available in the public domain and
14 our submissions are limited to what is an objective
15 commentary now 47 years later of the legal landscape
16 then.

17 Mr Altman rightly summarised two questions in his
18 opening address in respect of 1970: was it an example of
19 the establishment protecting another person in power;
20 and was it an unreasonable advice as against the law as
21 it applied at the time?

22 Taking the first of these questions, and it of
23 course goes to your paragraph 1.5 in your terms of
24 reference, looking back now at the documentary evidence,
25 to the extent that we can comment at all upon it, we

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1 submit that you're entitled to conclude on the facts
2 that the request for advice was received in the office
3 of the DPP on 16 March, acknowledged on its receipt on
4 analysis in fact by an N or MD Hutchinson.

5 It turns out that that man, Mr Hutchinson, was
6 likely to have been one of the assistant directors in
7 the department at the time. He had been in 1962. The
8 advice itself of 19 March, the Thursday by then, was
9 also signed by N or MD Hutchinson and expressed, as you
10 know, in the first person, "I". Therefore, on the face
11 of it, it is Mr Hutchinson's advice. These are the
12 facts.

13 Indecent assault wasn't an offence that required the
14 DPP's consent to charge, unlike, for example, murder,
15 and Hutchinson was advising and not using any delegated
16 DPP's powers, which came in during the next DPP,
17 Sir Thomas Hetherington's, time.

18 The reality is that Smith at the time was
19 a prospective parliamentary candidate only for a party
20 not then in power, and whilst, of course, prominent in
21 Rochdale in 1970, perhaps, may well not have been so
22 country-wide.

23 Smith's case probably, it seems, doesn't and did not
24 fit into the serious category identified by Skelhorn in
25 his memoirs.

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1 We know from those documents that the structure of
2 the department was such that assistant directors --
3 there were more than one at times -- would prepare
4 advices. We also know, as it happens, that the verdicts
5 in a very notorious Luton sub-Post Office murder case
6 were also returned on that same day, 19 March. And
7 moving forward to nine years later, in fact, 1979,
8 Skelhorn, it seems, told Mr Bartlett at the RAP that he
9 couldn't recall such a case.

10 Flowing from that, we submit that, whilst it is
11 perfectly understandable that Mr Bartlett and others,
12 including more recently so, assumed that Skelhorn
13 himself had advised not to charge Smith -- after all,
14 the advice was provided by the office of the director,
15 there was said to be a file in the director's office and
16 it was on headed notepaper -- of course the director
17 ultimately, I suppose, was accountable for it -- there
18 appears to be no other evidence in fact demonstrating
19 that the director himself was actually, as it turns out
20 now on the evidence, responsible for it.

21 It is on balance now, you may think, unlikely that
22 the DPP actually drafted or even had a hand in that
23 advice, which you may think does in fact chime with the
24 report on the later phone call to Mr Bartlett that he
25 the director, if it was that man, didn't in fact recall

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1 such a file on Cyril Smith in 1970.

2 It follows too, we submit, with focus on your terms
3 of reference, and looking back at the documents, as we
4 all can, there is in fact little or no reliable evidence
5 that the DPP was actually directly involved in any
6 attempt inappropriately to influence the decision and
7 less likely, therefore, that advice from an assistant
8 director, not a decision by a DPP, was inappropriately
9 influenced by anybody outside the department or at all.

10 Just looking back, we were given something of an
11 insight as to how different the whole setup was in the
12 1970s from Eleanor Phillips, who I think described it as
13 "old century": a good description, obviously.

14 Dealing with the second question posed by Mr Altman:
15 was the advice unreasonable as against the law as it
16 applied at the time? I acknowledge that if there is
17 a significant question mark over the quality of
18 the legal advice itself, then that just might lend
19 support to an assertion that there must have been
20 inappropriate influence. We emphasise that it was the
21 assistant director who was giving the advice, in any
22 event.

23 So looking at that, Mr McGill can only provide what
24 is a commentary looking at the case now through the eyes
25 of a 2017 prosecuting lawyer, experienced as he is, into

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1 that 1970 legal landscape based, as it was, in large
2 part on the common law that not least was changing, was
3 not perfectly clear, not closed to varied
4 interpretation, and recognise that there have been
5 serious lessons learned in the law over the decades in
6 respect of delay, myths and stereotypes. Mr McGill's
7 evidence was that the director -- as we then were
8 assuming; perhaps in the evidence it was in fact
9 a Mr Hutchinson, it is now pretty clear -- would have
10 found himself, said Mr McGill, in a difficult position
11 on the law.

12 It is difficult to say that it was not a reasonable
13 decision based on the confusion on the law at the time.

14 I hope it is right and accurate to say that
15 Mr McGill accepts that there are questions that can be
16 asked today as to the quality of that advice, looking at
17 it now under a microscope. But the fact is that the law
18 was not certain, and indeed it might be thought that the
19 Court of Appeal would have almost run out of work had
20 the law on corroboration been uncontroversial.

21 You will have to look to see whether that provides
22 any real support for the assertions in respect of
23 Skelhorn. Can I ask at this point that a document be
24 put up, just to emphasise the point and perhaps tell us
25 what the full extent of the evidence is: CPS002813,

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1 Mr McGill's statement, at internal page 15. It is the
2 bottom of that page, the last paragraph, it is Phipson
3 On Evidence, published in 1970, it is that edition. We
4 quoted, or Mr McGill quoted, from it:

5 "Inadmissible: ... A [a person, obviously, and this
6 was taken from a case] is a schoolmaster charged on
7 sixteen counts with indecent assaults on boys from the
8 school."

9 Pausing there, plainly a system, you may think:
10 "Evidence of such an assault on one boy is not
11 admissible for the purposes of proving such an assault
12 on any of the others."

13 And the case of Flack is cited. It means that there
14 was conflicting law at the time and Phipson is a pretty
15 authoritative textbook.

16 By today's standards, this automatic legal question
17 mark constantly hanging over the evidence of witnesses
18 in sexual cases, and particularly children -- that is,
19 the need for corroboration, the warnings of convicting
20 in its absence -- is perhaps startling.

21 From Mr McGill's evidence, if you looked carefully
22 at the Court of Appeal authorities, followed one line of
23 authority and ignored that well-respected and current
24 textbook of 1970 (as it happens, Phipson On Criminal
25 Evidence), would you conclude that the fact of

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<p>1 a collection of similar complaints would arguably 2 corroborate the others and the evidence would be 3 admissible to rebut the assertions made by Smith such as 4 they were? 5 Also, Mr McGill reminded us that the character of 6 complainants and staleness of complaints also then were 7 more relevant considerations than they are today. Today 8 it is a very different approach, as you know. So we are 9 looking -- seeking to look back and put ourselves into 10 1970. 11 Taking his analysis into account, you will want to 12 consider whether either of Mr Altman's questions then 13 can be answered in the affirmative. You would be 14 entitled to say that they are not, bearing in mind that 15 it wasn't the director himself acting at all, it seems, 16 and the law was, on any account, uncertain, albeit by 17 today's standards pretty surprising. 18 So we move, if I may, to matters of actual relevance 19 to the Crown Prosecution Service. By then, 1998/1999, 20 criminal prosecutions were in the hands of the 21 independent prosecution service, the Crown Prosecution 22 Service, comprising of a cadre of independent lawyers. 23 A Branch Crown Prosecutor is a reasonably senior 24 lawyer. In fact, Mr McGill was only in that post after 25 10 years. He, the BCP, was asked to look at the 1970</p> <p style="text-align: center;">Page 69</p>	<p>1 work' with the children of the town? 2 "It seems to me that each of the complainants had 3 a very good reason for failing to complain or pursue an 4 initial complaint against him." 5 Paragraph 8, also on page 2, the fourth line down: 6 "However, [dealing with their background that is 7 apparent to the person] the existence of convictions 8 does not necessarily mean that each of them was not 9 telling the truth. Any such suggestion can be countered 10 by the fact that the prosecution case is not founded 11 upon a single assertion by a single complainant but by 12 eight separate complainants giving virtually the same 13 account. I think it is also significant that the nature 14 of the complainants from those not residing at 15 Cambridge House, namely [he identifies two], are similar 16 to those made by those residing there but the alleged 17 misconduct has been adapted to their situations." 18 Over the page to page 3, paragraph 10, line 6: 19 "However, I am conscious, as I have said earlier, 20 that corroboration is very often not available to 21 support misconduct of the type complained of. The lapse 22 of time is no longer as important as it was. A lapse of 23 five or six years would not automatically preclude 24 proceedings. Furthermore, there has been a marked 25 change of attitude in the criminal justice system</p> <p style="text-align: center;">Page 71</p>
<p>1 evidence, 28/29 years later. On any account, by the 2 standards of 1998/99, these were unusual legal 3 circumstances. Of relevance you may think, given that 4 this inquiry has made a central part of its foundation 5 the survivors' accounts, is that the BCP, in applying 6 the evidential stage of the two-stage test with which 7 you are familiar, firstly accepted the accounts given by 8 the complainants. It is an important feature of his 9 advice. He accepted their accounts and expressed an 10 appreciation and understanding of their position. 11 I would like, if I could, please, to ask that CPS002780 12 is put on the screen. Thank you. Paragraph 2. This is 13 the BCP's advice: 14 "I note that all the complainants were, at the 15 relevant time, teenage boys aged 15 or 16 years and all 16 vulnerable to the extent that they were living away from 17 home in the hostel named or dependent upon S, either for 18 employment or financial or quasi parental support." 19 If we could go over the page, too, please, to 20 paragraph 4: 21 "It is perhaps understandable having regard to the 22 physical size of S, his position of authority at the 23 hostel and within the town that each of [the 24 complainants] failed to complain. Was their word likely 25 to be accepted against his, having regard to his 'good</p> <p style="text-align: center;">Page 70</p>	<p>1 towards cases of this kind in which those in positions 2 of authority have taken advantage of it to commit 3 offences on a wholesale basis against those who are 4 vulnerable and in their care." 5 He goes on to deal with what he has dealt with 6 before. 7 You can see from this report, this advice, 1998, the 8 sort of approach that that lawyer, the Branch Crown 9 Prosecutor, was taking. 10 Can I ask then also that CPS002813 is put up on the 11 screen again because it is taken from Mr McGill's 12 statement. I just want to read all of a paragraph that 13 was perhaps cut short earlier this morning. 14 If you go, when it comes up, to page 29, please. 15 I'm afraid I hadn't given warning of this document. 16 Thank you very much. At paragraph 105 at the top: 17 "In other respects, Mr Watson's approach ..." 18 This is Mr McGill's statement, I emphasise: 19 "In other respects, [the BCP's] approach to 20 'corroboration' of the complainants' accounts (he said 21 there was none) [I have just read out the BCP's advice] 22 is open to criticism, although he nevertheless concluded 23 in 1998 that the evidential test was satisfied, that is, 24 that the evidence presented to him from the complainants 25 and from the surrounding circumstances provided</p> <p style="text-align: center;">Page 72</p>

<p>1 a realistic prospect of a conviction. It is also right 2 that he did point to the fact that 'the prosecution case 3 is not founded upon a single assertion by a single 4 complainant, but by eight separate complainants giving 5 virtually the same account'. He therefore [says 6 Mr McGill] expressed the view that the fact that there 7 were a number of complainants strengthened the overall 8 case." 9 That tends to suggest, doesn't it, strongly, that 10 the BCP was looking at this case and concluded not least 11 that the evidential test was satisfied and that he 12 accepted the accounts given by the complainants. In 13 those circumstances, he came to a proper conclusion on 14 the evidence, and we do hope that to some small degree 15 it will help that those accounts were accepted by the 16 prosecuting authorities. 17 However, quite independent of that evidential test 18 was the BCP's view that it would be likely that a judge 19 would stop the case as an abuse of the process. It is 20 a term of art, in a way. Abuse of the process was 21 a legal argument that was prevalent in the 1990s, and 22 successful perhaps more often than it should have been, 23 and certainly much more so than today. It was founded 24 on what was known as a legitimate expectation, a phrase 25 used from time to time in legal argument. A legitimate</p> <p style="text-align: center;">Page 73</p>	<p>1 things, we submit. 2 Indeed, it is not said today that it was wrong in 3 law, but just "unbalanced", I quote, therefore, a wrong 4 judgment call. 5 But it does follow that this was a call made by an 6 independent lawyer, by now part of the independent 7 prosecuting authority, with no connection directly or 8 indirectly with the events or to those concerned with 9 them, doing his job, applying the Code of Crown 10 Prosecutors as he did, confronted by, the evidence 11 shows, very unusual factual circumstances, and in 12 a legal atmosphere that favoured abuse of process much 13 more than it does today. That is the evidence and 14 something that is important to note when it is said that 15 it is unbalanced. 16 We submit that his advice of course was neither 17 dishonest nor influenced improperly by, or at all, any 18 matters other than the law as he applied it to the facts 19 as he knew them, nor was it in fact incompetent. Many 20 today in a different legal world, even from 1998/99, 21 might have put the onus on the judge to decide whether 22 an abuse of process applied. I hope that the proper 23 content and the full content of Mr McGill's evidence is 24 examined and, if you wish to note where it comes from, 25 paragraph 108 at page 29 of Mr McGill's statement</p> <p style="text-align: center;">Page 75</p>
<p>1 expectation arising from the 1970 decision communicated 2 to Smith and given some extra permanence, of course, by 3 the passage of that time, some 28 years. Mr McGill was 4 of the view that this question was something that any 5 prosecutor considering a case such as this in these 6 particularly unusual circumstances would ask himself. 7 Mr McGill was plainly right about that. 8 The BCP's advice was a judgment, then in 1998, upon 9 a promise that Smith was not to be prosecuted -- I use 10 the word "promise" in its legal sense from 1970, the 11 28 years since, and the 33 years since the offending. 12 It was a judgment call, and so one has to examine that 13 judgment and examine the criticisms now made with care, 14 that the court should have been asked to examine the 15 position. The BCP, it is said, could only sensibly have 16 come to the conclusion that the judge should decide. 17 Well, today Mr McGill encourages his lawyers to have 18 the courage of their convictions, make decisions 19 themselves. He recognises, Mr McGill, that at the time, 20 and today, some in the same position might have 21 exercised their judgment to leave a decision to the 22 judge in court after a charge of Smith, but Mr McGill 23 did not categorise the BCP judgment as unreasonable, 24 despite saying that another prosecuting lawyer might 25 have taken a different view. They are two different</p> <p style="text-align: center;">Page 74</p>	<p>1 provides the answer. 2 If there is any concern about the BCP's use of 3 the word "corroboration" in 1998, that has to be seen in 4 the context that he was plainly using it in, in the 5 evidential sense and not as a legal requirement. We 6 have just identified the fact that the BCP plainly did 7 identify the corroborative nature of the evidence he was 8 provided with. 9 Of note, and whilst it is not determinative at all, 10 it is clear when we have to look back at 1998 that the 11 advice actually came as no surprise to the GMP in 1998 12 who themselves, taking over as they did from the 13 high-quality investigation that had been completed by 14 their predecessors back in 1970 (and you will remember 15 Mr Bottomley's evidence) indicated that it came as no 16 surprise, that advice, to the GMP. 17 1999, that addendum advice. The BCP rightly 18 concluded that one victim's account didn't disclose 19 a criminal offence, although there would have been scope 20 for using the evidence but not as a basis for a charge. 21 In respect of credit issues of the second person, a not 22 unreasonable decision for that time. These allegations 23 would have been looked at on their merits, but not in 24 vacuum, just as the BCP can be shown to have done. 25 Finally, no prosecutor should substitute the need</p> <p style="text-align: center;">Page 76</p>

<p>1 for evidence with being informed by a newspaper article, 2 however compelling that might be. 3 What of course will be appreciated is that neither 4 judgment in 1998 or 1999 would have affected the 5 decision that was likely in his view at that time in 6 that 1990s climate that, whilst the evidential test had 7 been satisfied, any prosecution would be likely to have 8 been stopped by the judge. One has to stand back and 9 look to that 1998/99 decision and decide, indeed, 10 whether it was unbalanced or unreasonable. We submit on 11 the legal landscape, even at that time, it was neither. 12 The 2012 review, after Smith had died, is relevant 13 perhaps only to emphasise how the law had moved on again 14 by then, and to underline how decisions by lawyers are 15 seldom completely straightforward. 16 Today, why is it relevant what the position is 17 today? Because you will publish a report setting out 18 your findings, chair, the lessons learned and 19 recommendations to improve child protection and 20 safeguarding in England and Wales. Without wishing to 21 pre-empt any findings and recommendations, and the CPS 22 of course plainly will look very carefully at any that 23 are made in respect of today's prosecutorial practice, 24 it may be of note that the evidence really is 25 overwhelming that the CPS plainly has developed and</p> <p style="text-align: center;">Page 77</p>	<p>1 interest concerns." 2 If we could go over the page briefly: 3 "As the Codes evolved with the law as it changed, it 4 will be seen that they became targeted at particular 5 areas of the ... system, at specific types of offending 6 and at a consideration of the victims of crime. In this 7 sense, the Codes evolved over time from being suspect 8 focused to more victim focused." 9 If we could go also to page 41, paragraph 152, this 10 is the latest code: 11 "... after a three-month public consultation ... 12 remains the current ... Code ... it is now an 13 overarching statement of principles, making it more 14 streamlined and applicable to the variety of cases 15 handled by prosecutors and police." 16 Could you go on to 46, please. This is just 17 a summary. You will pick up the whole amount and indeed 18 the documents if you wish to go to them. Updated in 19 2012, guidelines on prosecuting cases of child sexual 20 abuse; rape and sexual offences guidance 2012; 21 safeguarding children as victim and witnesses, interim 22 guidelines on prosecuting cases of child sexual abuse. 23 If we could go over the page, guidelines on prosecuting 24 cases of child sexual abuse. You can see the factors, 25 it is only a brief summary here, included in that</p> <p style="text-align: center;">Page 79</p>
<p>1 responded to changes as they occur, in consideration of 2 the evidence presented to it, in its approach to the 3 nature of the evidence, a better understanding of 4 victims and children as witnesses in such cases, and 5 applying the law and the changes in it as it seeks to 6 deal with the undoubted difficulties in this area and as 7 the law seeks to reflect changes in society. 8 It is a completely different picture that you are 9 presented with today, 2017. There is only a summary of 10 this found over pages at the end of Mr McGill's 11 statement of the public documents often brought about 12 after a public consultation and with specialist input. 13 Can I just identify some examples in CPS002813. 14 You will see from paragraph 111: 15 "The preparation of each revision [of the Code of 16 Crown Prosecutors] today includes a wide range of public 17 consultation. The Code of Practice in Consultation 18 requires that prior to finalising a new version of 19 the Code, the service must first publicly consult upon 20 the proposals." 21 You can see that there was in respect of the latest: 22 "... the Codes reflect the law as it is at that time 23 and must reflect changes not only in the law as 24 implemented by parliament and as developed and explained 25 by the courts ... but also changes as a result of public</p> <p style="text-align: center;">Page 78</p>	<p>1 guidance. It goes on, safeguarding children as victims 2 and witnesses, legal guidance in 2015, which updated the 3 2012 guidance; again, going down to very recently, 4 27 July 2017, guidelines on prosecuting cases of child 5 sexual abuse, updating the last guidelines. 6 So you will appreciate -- and these are just the 7 headings -- and see that the codes and the guidance are 8 carefully prepared, they are targeted and reflect 9 precisely upon needs, and, in particular, victims' 10 needs. 11 If I can trespass upon your time just into lunch, an 12 important development is the victim's right to review, 13 again a public document, of course, it is an important 14 development, and it properly illustrates the significant 15 shift in recent years towards a much more victim-focused 16 approach that's been taking place for a number of years. 17 It was introduced four years ago and it is a right 18 to seek a review of the CPS or indeed police decision. 19 If any person is not satisfied with a CPS or police 20 decision not to prosecute, the victim is entitled to 21 seek a review of that decision, and obviously to be 22 given enough information to be able to ask for the 23 decision to be reviewed. 24 In addition, by way of example, although just some 25 of the developments in this area where victims' rights</p> <p style="text-align: center;">Page 80</p>

1 are now engrained in the codes of practice, in sexual
2 cases and in child sexual abuse cases, the CPS offer the
3 victim a meeting to further explain any decision not to
4 prosecute following a pre-charge advice or to
5 discontinue a case post charge or to change a charge.
6 It is also a victim's right to be informed about the
7 police investigation such as arrests and charge, to make
8 what's known as a victim's personal statement setting
9 out the impact that the offending has had upon them at
10 the time; to be informed if a suspect is to be
11 prosecuted or not; plus to be informed of the decision
12 within one day if they are entitled to what's called
13 enhanced service, which includes all those who suffer
14 sexual offences, and the victims of such crime are
15 automatically considered to be intimidated and
16 consequences follow as to their rights in such
17 circumstances.
18 Having seen Mr McGill's statement, Mr Altman
19 commented whilst calling Mr McGill that the series of
20 different guidance and policy documents are what are
21 provided to Crown prosecutors to make a proper decision.
22 That is a correct and accurate commentary, we submit.
23 As a matter of almost separate detail but relevant
24 to some of the issues here today, for many years, if
25 a suspect or a defendant is not to be charged, there

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1 will be a caveat recorded on the letter sent to him or
2 her informing them of that decision and that should any
3 of the evidential picture change, charges can be brought
4 nevertheless.
5 Training. Ms Hoyano has addressed you, and we
6 submit in this respect we agree. Training is plainly
7 necessary for all authorities. The Crown Prosecution
8 Service established a number of years ago a group of
9 specialist lawyers for cases of rape and serious sexual
10 assaults, known as RASSO. Lawyers are selected to work
11 in the group, undertake a two-day course -- they
12 actually have to pass the tests -- raising awareness of
13 victim and witness issues, to treat witnesses as they
14 would expect to be treated in those often terrible
15 circumstances, seek to eradicate the myths and
16 stereotypes, and you saw that referred to in the summary
17 of the documents I have put up, ensure awareness of and
18 compliance with the policies on rape and sexual assault,
19 the lawyers are encouraged to ensure they have the
20 practical skills in handling rape cases, to ensure, as
21 is possible on the facts and evidence, an overall
22 consistent approach and show awareness of the value of
23 relationships with other agencies and voluntary groups,
24 and every year each lawyer has to undertake a refresher
25 course.

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1 By way of example, following the increased number of
2 cases involving non-recent sexual abuse recently, and
3 also gang-related sexual abuse, the CPS revised and
4 updated its RASSO training. All existing lawyers within
5 the group are required to undertake this training,
6 confronting the issues such as those faced by victims of
7 gang-related sexual violence and the abuse of young
8 children.
9 So, chair, I have set out in a little detail --
10 sorry to have trespassed on your time -- what the
11 position is today, both legally and factually, policy
12 and guidance. We are in a different regime today, even
13 from 1998, and obviously so from the 1970s, although we
14 only touch on that by way of commentary.
15 It is what is only a short summary of the very
16 comprehensive, thought-out and targeted guidance, and
17 what we know from public knowledge tells us that today
18 we submit prosecutions are properly undertaken in the
19 proper cases. I hope that's been of some assistance.
20 THE CHAIR: Thank you, Mr Brown. We will now rise and
21 return at 2.00 pm.
22 (1.00 pm)
23 (The short adjournment)
24 (2.00 pm)
25 THE CHAIR: Ms Studd?

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1 Closing statement by MS STUDD
2 MS STUDD: The real flavour of the police response to
3 Knowl View is best illustrated by those who were present
4 at the time and on the ground dealing with the issues.
5 You will recall Mr Bradshaw on Day 9 saying that in his
6 view the police got better and better. He said:
7 "I wouldn't say I bullied them, but I pestered them
8 to respond."
9 Later on, he said:
10 "I have to say that the police were excellent but
11 the police had no powers. But they actually arrested
12 him [Mr Hilton] and moved him on for breach of
13 the peace."
14 You will recall Mr Digan, when he gave evidence,
15 saying:
16 "The police, the Rochdale Police, were absolutely
17 excellent in their response. They would always come out
18 and they would always remove Mr Hilton from the grounds.
19 If it was twice a night, three times a night, the police
20 always came out and they always moved him but, because
21 there was no injunction, he always came back."
22 These views from the individuals tasked with
23 modernising Knowl View School and putting systems in
24 place to keep the young residents and pupils safe; these
25 two people, Greater Manchester Police would say, with

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<p>1 first-hand information about how the local police were 2 performing in relation to assisting the school with 3 their difficult tasks. 4 The Greater Manchester Police consider the oral 5 hearings in relation to this module have been 6 illuminating and clearly beneficial with many documents 7 recording the decision-making process aired in public 8 for the first time. We hope that the victims and 9 survivors, unable to have their say for so long, have 10 benefited from hearing the detail of their concerns 11 aired in a public forum and that at least some of them 12 have been allayed and some of their questions have been 13 answered. 14 From the point of view of the Greater Manchester 15 Police, the evidence has shone a light on a set of 16 circumstances that was crying out for statutory reform, 17 namely, the inability of police and others to take 18 proactive and preventative steps short of criminal 19 prosecution to restrain and restrict those with 20 paedophile predilections from posing a risk to children. 21 We would ask the panel to be slow to come to any 22 adverse conclusions against either an individual officer 23 or the force as a whole unless the evidence and 24 documentation is conclusive. It is easy for an inquiry 25 to speculate on a likelihood and draw a conclusion</p> <p style="text-align: center;">Page 85</p>	<p>1 exploitation occurring at the Smith Street toilets and 2 the adequacy of the police response. 3 Dealing first of all with the enquiry into any 4 failure to investigate the activities of Cyril Smith and 5 others, so far as public perception is concerned, this 6 is perhaps central to this module of the inquiry. As 7 well as the brave and courageous evidence from the 8 victims and survivors, the panel has heard the evidence 9 from Mr Marsh, Mr Bottomley and Detective Chief 10 Inspector Jones in relation to the various enquiries 11 that were made into the activities of Cyril Smith both 12 during his lifetime and after his death. 13 The evidence gathered by Operation Cleopatra and 14 provided to the inquiry shows that that gathered by 15 Lancashire was again submitted to the Crown Prosecution 16 Service as a result of a referral from Operation 17 Goldfinch in South Wales. 18 On 17 June 1998 and 21 May 1999, the Crown 19 Prosecution Service provided written advice concluding 20 that there should not be a prosecution for reasons that 21 were nothing to do with the investigation and related 22 solely to the assurance that Cyril Smith had been given 23 in 1970 that he would not be prosecuted. 24 You have looked at those written advices in the 25 course of your inquiry and placed the documents in</p> <p style="text-align: center;">Page 87</p>
<p>1 because of paucity of documentation. Sometimes that 2 might be justified. But such a course would not be 3 appropriate here where the material is lacking because 4 it has been properly and appropriately weeded due to 5 passage of time, and where there is no suspicion and no 6 suggestion that material has been deliberately destroyed 7 and concealed. 8 Were you to draw an adverse inference on the basis 9 of a lack of material from a legitimate and explicable 10 absence of that contemporary material, it would be 11 unfair to those involved in your criticism. 12 In the course of the oral hearings, the inquiry has 13 been able to investigate and examine the following 14 issues as they concern the Greater Manchester Police, 15 and I want to deal with three topics. 16 First, the suggestion that the police failed to 17 investigate the allegations of sexual abuse by 18 Cyril Smith and others due to either political pressure 19 or collusion between the police and Cyril Smith himself. 20 Second, the powers that were available to the police 21 to prevent Roderick Hilton, a convicted sex offender, 22 from entering or approaching Knowl View School and 23 posing a risk to the vulnerable boys either inside or 24 outside the school grounds. 25 Thirdly, the investigation of the child sexual</p> <p style="text-align: center;">Page 86</p>	<p>1 relation to this issue in the public domain. 2 As Ms Hoyano said on Day 2 of this inquiry, in terms 3 of the subsequent investigations we say that the 4 police -- in fact she called them the Lancashire Police, 5 but it relates to Greater Manchester -- were courageous 6 in trying to restart the investigations against 7 Cyril Smith in 1998 and 1999 at a time when Cyril Smith 8 was supposedly the most popular politician in England, 9 but once again they were thwarted by the CPS in two 10 decisions, which we say again were fundamentally flawed 11 in their understanding and application of the law. The 12 Greater Manchester Police does not comment on the 13 conclusions reached by the Crown Prosecution Service. 14 The additional enquiries that took place prior to the 15 second referral and in particular the investigation of 16 the complaints made by A1, A4 and A68 can allow this 17 inquiry to allay public concerns in concluding the 18 Greater Manchester Police did all that could reasonably 19 have been expected of it in the course of 20 Operation Cleopatra to seek to bring Mr Smith before the 21 court in his lifetime. 22 That there were no criminal proceedings in 1998 or 23 1999 cannot be laid at the door of the Greater 24 Manchester Police and this inquiry should publicly 25 acknowledge that by way of a finding.</p> <p style="text-align: center;">Page 88</p>

<p>1 The panel has heard that there were a number of 2 investigations into child sexual abuse in Greater 3 Manchester Police after 1974, the most notable 4 operations were of course Operation Cleopatra, 5 Operation Jaguar and Operation Clifton. In each case it 6 appears that a proper and proportionate investigation 7 took place. They resulted in some prosecutions and 8 convictions and within there there were some 9 investigations which did not proceed for perfectly 10 explicable and understandable reasons for which there is 11 no element of fault or blame.</p> <p>12 I turn to deal with the powers available to prevent 13 Roderick Hilton from visiting, attending or making 14 a nuisance of himself in and around Knowl View School.</p> <p>15 It is clear from the evidence that while some did 16 not appear to regard Roderick Hilton as a risk or threat 17 to boys at Knowl View School, very many others 18 recognised him to be the danger that he clearly was. 19 There is evidence of considerable discussion about the 20 proper way to manage the risk that he posed, most 21 notably in the tripartite correspondence which you have 22 been referred to at RHC001505. I don't need that up on 23 screen.</p> <p>24 Counsel to the inquiry made the suggestion to 25 Mr Bottomley that section 5 of the Public Order Act</p> <p style="text-align: center;">Page 89</p>	<p>1 under subsection 4 had been given or other arrest 2 conditions being satisfied.</p> <p>3 It would not have provided for an arrest had 4 Mr Hilton been inside Knowl View School at the time, and 5 of course, perhaps most importantly, the sanction was 6 limited to a fine and would have no long-term 7 preventative effect. It is difficult to see how 8 routinely, at least, the officers could have lawfully 9 used section 5 as a panacea for the arrest of 10 Roderick Hilton on every occasion when their assistance 11 was called. We make no criticism of Mr Altman for 12 making reference to section 5 of the Public Order Act, 13 but it merely demonstrates the statutory vacuum that 14 existed in relation to the powers to protect the 15 vulnerable and prevent harm, even from people who had 16 a pre-existing conviction for a sexual offence.</p> <p>17 Reference has been made to the obtaining of an 18 injunction against Roderick Hilton, and in the light of 19 the concession made by Mr Ford, I needn't detail those 20 provisions on injunctive relief. They are set out in my 21 written closing for your convenience. But on any view, 22 those powers, even if they could have existed, were 23 rarely used for situations such as restraining a person 24 with a sexual offence conviction. They could have been 25 used, of course, for other causes of action which were</p> <p style="text-align: center;">Page 91</p>
<p>1 might have provided an opportunity for the police to 2 have dealt with Mr Hilton effectively. It is worth just 3 spending a few moments to look at that section. 4 Section 5 of the Public Order Act, as it was in force at 5 the time, provided that a person was guilty of an 6 offence if he used "threatening, abusive, insulting 7 words or behaviour within the hearing or sight of 8 a person likely to be caused harassment, alarm or 9 distress."</p> <p>10 It was an offence that could not be committed by 11 a person in a dwelling if the person he was threatening, 12 being abusive to or insulted was also in a dwelling, and 13 it was not arrestable unless he had been warned by an 14 officer to desist in his behaviour and carried on 15 regardless, unless that and other conditions arose.</p> <p>16 An analysis of that section demonstrates the 17 difficulties, in our submission, in using that section 18 routinely to remove Roderick Hilton from the area or 19 from the school or from the school premises. It would 20 require part of his behaviour to have been threatening, 21 abusive or insulting. It is unlikely, in my submission, 22 that approaching boys in the street or camping on the 23 footpath are likely to have reached that threshold.</p> <p>24 Of course, any power of arrest would have been 25 subject to the behaviour continuing after the warning</p> <p style="text-align: center;">Page 90</p>	<p>1 in the hands of the local authority.</p> <p>2 Since the 1990s, the development of preventative 3 orders, madam chair, have changed this landscape, some 4 of which I am sure your panel will be very familiar 5 with. The Sex Offenders Act in 1997 created the 6 notification requirements for those convicted of sexual 7 offences. This is commonly referred to as the Sex 8 Offenders Register. These orders did not prohibit or 9 limit behaviour, but at least required potentially 10 dangerous offenders to provide their address to the 11 police. Following on from that, in the section 2 of 12 the Crime Disorder Act 1998, it provided for sex 13 offender orders which gave magistrates' courts 14 jurisdiction to place restrictions on freedom of 15 movement where a person had a conviction for a relevant 16 offence. In the same Act, section 1 provided for 17 antisocial behaviour orders which were a preventative 18 order which did not require proof of a conviction.</p> <p>19 But certainly, this early preventive provision would 20 of course have permitted the police to take action 21 against Roderick Hilton and at least attempt to protect 22 the boys from the area in and around Knowl View School. 23 Without tracing the developments in this area right 24 through, currently section 103A of the Sexual Offences 25 Act 2003 provides for a sexual harm prevention order and</p> <p style="text-align: center;">Page 92</p>

<p>1 gives the court wide powers of control over a person 2 with a conviction for a relevant offence. 3 In relation to those without a conviction, there is 4 a sexual risk order with similar provisions under 5 section 122A of the Sexual Offences Act 2003 as amended, 6 which provides for similar provisions where there is 7 a perceived risk of sexual harm. 8 This all illustrates that there have been 9 considerable legislative changes since the early part of 10 the 1990s when these events took place, and just looking 11 at the statutory provisions currently in force, it is 12 certainly arguable that were the same events to occur 13 today, the provisions of section 103A of the Sexual 14 Offences Act would have provided for a proactive step to 15 be taken by police in relation to Roderick Hilton and 16 consideration would certainly have been given to apply 17 for an order under section 122A in respect of 18 Cyril Smith. 19 Since these events, it is clear that parliament has 20 clearly and properly placed a greater emphasis on the 21 protection of the vulnerable from the manipulation and 22 harm caused by paedophiles by implementing statutory 23 preventative measures. 24 These measures enable public authorities, including 25 the police, to proactively target those who pose</p> <p style="text-align: center;">Page 93</p>	<p>1 because, as you may recall, the papers were rather 2 jumbled. 3 But what appears to have happened is that on 4 19 August, A10 and A9 were picked up at the Rochdale 5 toilets. They were offering their bodies for sale or 6 offering to masturbate any man who might fancy it. He 7 was to be charged with gross indecency but that might 8 not happen, given both A9 and A10 gave the police 9 a statement about the matters. Then it seems to have 10 gone to a man by the name of Peter Partridge and there 11 was a discussion about how he was going to be referred 12 to the cautioning panel, and then a telephone call to 13 the social worker on 1 September 1992 where the social 14 worker says: 15 "I told Peter I was extremely concerned about A10's 16 activities but was constantly met by a brick wall on any 17 occasion that I have attempted to discuss it with A10." 18 After a discussion with the social worker, it was 19 decided that Social Services Department's recommendation 20 would be a caution and no further action. 21 There is actually no confirmation or any record 22 produced to confirm whether that caution was actually 23 administered, but you will remember that Mr Marsh told 24 you in evidence that even then, from his experience, 25 that would be a last resort on a child.</p> <p style="text-align: center;">Page 95</p>
<p>1 a sexual risk and enable their potential victims to be 2 better protected. 3 The third topic I want to deal with is child sexual 4 exploitation and the issues arising from the 5 Smith Street toilets. By way of opening, the Greater 6 Manchester Police acknowledged that some of the language 7 used in the documentation is not the language that would 8 be used today. The references to "importuning", 9 "cottaging" and "rent boys" are but a few examples. The 10 fact that this was mentioned and was considered 11 important enough to be mentioned clearly illustrates the 12 change of approach to these types of behaviours. 13 Greater Manchester Police would wish to draw the 14 panel's attention to a number of factual issues which 15 may require consideration. First of all, the 16 criminalisation of the boys and, secondly, surveillance 17 of the Smith Street toilets. 18 First, what is noticeable from the wealth of papers 19 that have been disclosed on relativity is that there was 20 no obvious action taken by the police to criminalise any 21 of these boys. Ms Dobbin, you will recall, raised the 22 issue with Mr Marsh earlier in the week and the 23 chronology of A10's involvement with the police can be 24 gleaned from his social services record, which I have 25 taken from its entirety and put it chronologically,</p> <p style="text-align: center;">Page 94</p>	<p>1 It is perhaps this lack of clarity over how to treat 2 these vulnerable children which caused the police 3 superintendent involved with the child-on-child abuse at 4 Knowl View to side with social services and not 5 proactively and unilaterally take on the investigation 6 into those allegations of abuse. 7 As you will know, madam chair and your panel 8 members, investigations of this type remain a very 9 sensitive area, even now, and in the absence of 10 social services' cooperation, it is most unlikely that 11 a sole police investigation then would have been 12 appropriate. The criticism made by Ms Hoyano should be 13 looked at in that context and of course in the knowledge 14 that the superintendent concerned has not been called 15 before you to account for his decision making in 1990 16 and 1991. 17 I should also take this opportunity to correct the 18 record in relation to Girl A, referred to this morning 19 by Ms Hoyano. Girl A came to the attention of 20 the police as a result of an allegation of criminal 21 damage in a cafe. It was whilst she was being 22 interviewed in relation to that incident that she 23 disclosed the abuse against her. Accordingly, she was 24 arrested before police had any knowledge that she was 25 a victim of exploitation and she was never charged with</p> <p style="text-align: center;">Page 96</p>

<p>1 criminal damage.</p> <p>2 Looking at the contemporaneous documentation, which</p> <p>3 we have looked at on relativity and over the last few</p> <p>4 weeks, in relation to A10, it seems to have been the</p> <p>5 case that any decision was made in relation to him after</p> <p>6 proper and appropriate consultation with</p> <p>7 social services. The police should not be criticised in</p> <p>8 relation to that decision concerning A10 given the</p> <p>9 likelihood that exceptional circumstances may have</p> <p>10 applied in his case and the limited documentary evidence</p> <p>11 that's available which demonstrates that the police</p> <p>12 action, if it did occur, was based upon a recommendation</p> <p>13 made by social services.</p> <p>14 Can I turn to deal with the issue of surveillance?</p> <p>15 The evidence of Janet Bowyer on Day 7 confirms that</p> <p>16 there was police activity as a result of the concerns</p> <p>17 raised about young boys being present at the toilets in</p> <p>18 Smith Street. You will recall her evidence that she</p> <p>19 told you that police officers came up to the</p> <p>20 social services office in order to observe the</p> <p>21 Smith Street toilets from the window. Mr Bottomley</p> <p>22 provided the inquiry with some evidence in relation to</p> <p>23 the nature of surveillance on public lavatories at this</p> <p>24 time. He told you he could give you some context</p> <p>25 because he was in the plainclothes department a bit</p> <p style="text-align: center;">Page 97</p>	<p>1 put in place by Mr Bradshaw. Although he did not</p> <p>2 provide any specific evidence about Smith Street, he was</p> <p>3 clearly putting in place strategies in order to keep the</p> <p>4 boys in his care safe.</p> <p>5 So that taken together with the overall impression</p> <p>6 provided by Mr Bradshaw and Mr Digan, which I referred</p> <p>7 to at the beginning, should allow the panel not to draw</p> <p>8 an adverse conclusion in relation to the surveillance</p> <p>9 undertaken at Smith Street. Additionally, the absence</p> <p>10 of contemporaneous documentation in legitimate,</p> <p>11 inexplicable circumstances, should not give rise to an</p> <p>12 adverse finding on this issue.</p> <p>13 While I just deal with child sexual exploitation,</p> <p>14 can I thank Ms Hoyano for her comment regarding Greater</p> <p>15 Manchester Police being the beacon of good practice</p> <p>16 regarding child exploitation. We hope it is reassuring</p> <p>17 for the victims and survivors that in GMP, and I suspect</p> <p>18 in other police areas, lessons have been learned. The</p> <p>19 panel will be aware, and the Greater Manchester Police</p> <p>20 accept, that the type of behaviour demonstrated at</p> <p>21 Smith Street would be viewed very differently today.</p> <p>22 The government definition of child sexual exploitation</p> <p>23 most recently set out in "Child Sexual Exploitation: The</p> <p>24 Definition and Guide for Practitioners, Local Leaders</p> <p>25 and Decision Makers", was set out in February of this</p> <p style="text-align: center;">Page 99</p>
<p>1 earlier than the '90s and he told you that it didn't</p> <p>2 mean there would be 24/7 surveillance with cameras, but</p> <p>3 it would mean that if there had been a complaint that</p> <p>4 after school, say, 4.00 until 6.00, men were</p> <p>5 congregating at toilets with a view to importuning young</p> <p>6 boys, plainclothes police officers would be in</p> <p>7 observation nearby and, if they saw any suspicious</p> <p>8 activity, they would move in and make the necessary</p> <p>9 arrests.</p> <p>10 So not something permanent, but more than a cursory</p> <p>11 nod from a police officer walking backwards and forwards</p> <p>12 past the toilets at the time.</p> <p>13 The panel will also have regard to the information</p> <p>14 given to the police by Val Mellor in her report that the</p> <p>15 surveillance was continuing in the summer of 1991 but</p> <p>16 there was no homosexual activity going on then and</p> <p>17 certainly none concerning boys at Knowl View School.</p> <p>18 That, in my submission, is important evidence because</p> <p>19 obviously at that time nobody was querying the conduct</p> <p>20 of the police surveillance operation. So you can be</p> <p>21 fairly sure that that was an accurate reflection of what</p> <p>22 was occurring at that moment; a snapshot, if you like.</p> <p>23 Without speculating too freely, of course that</p> <p>24 interpretation of what was happening at the Smith Street</p> <p>25 toilets could also have coincided with the regime being</p> <p style="text-align: center;">Page 98</p>	<p>1 year and, summarising, recognises this sort of behaviour</p> <p>2 as a crime and sexual abuse.</p> <p>3 The change of approach to be considered in</p> <p>4 conjunction with the significant developments in</p> <p>5 relation to the diversion of children away from the</p> <p>6 criminal justice system illustrated most clearly by the</p> <p>7 Crown Prosecution guidance on youth offenders and the</p> <p>8 section in the sexual offenders guidance in relation to</p> <p>9 the charging of youth offenders.</p> <p>10 The state of course has international obligations</p> <p>11 and I have given you the reference where you can find</p> <p>12 those, if it would assist you. This very morning the</p> <p>13 media have reported the fall in arrest numbers partly</p> <p>14 due to the change in system in relation to young</p> <p>15 offenders. So any consideration of the material clearly</p> <p>16 illustrates how considerations of youth offending have</p> <p>17 radically changed since the early 1990s.</p> <p>18 The Greater Manchester Police urge the inquiry to</p> <p>19 make no adverse finding in relation to its officers or</p> <p>20 the force as a whole, given the insufficiency of</p> <p>21 contemporaneous material. The panel can be reassured,</p> <p>22 if reassurance is needed, that since these events there</p> <p>23 has been a wholesale statutory change which should</p> <p>24 enable better protection to be afforded to a child in</p> <p>25 the position of A1, A2, A4, A7, A5, A6, A9 and A8, who</p> <p style="text-align: center;">Page 100</p>

1 gave evidence before you, and any other child in similar
2 circumstances in the future.
3 There is now a government definition of child sexual
4 exploitation as a form of sexual abuse and an increased
5 diversion of youths from the criminal justice system.
6 We hope that this will make the victims and survivors
7 here feel satisfied that those in the future will be
8 better protected.
9 THE CHAIR: Thank you, Ms Studd. Ms McGahey, do you wish to
10 speak?
11 MS MCGAHEY: No, thank you, madam.
12 THE CHAIR: Thank you. Mr Altman?
13 Closing statement by MR ALTMAN
14 MR ALTMAN: Chair, there is nothing we wish to add to what
15 we said during the course of our opening statement on
16 9 October, or indeed in response to the closing
17 statements made on behalf of the core participants.
18 For the sake of completeness, it is important to
19 note that there are almost certainly some documents
20 which have not been mentioned in the course of
21 the hearings, but which have been disclosed to core
22 participants and which you, chair, and panel members may
23 wish to review as you consider any findings and
24 recommendations. Any such documents will be published
25 on the website in the coming weeks.

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1 Finally, can I add that we hope that the report into
2 this investigation will be published as soon as possible
3 in the new year, and before the interim inquiry report
4 is to be published. Thank you.
5 THE CHAIR: Thank you, Mr Altman.
6 Just very briefly, before we conclude this public
7 hearing into Cambridge House, Knowl View and Rochdale,
8 the panel and I are grateful to all of the witnesses who
9 have come to testify before the inquiry during the
10 hearing: the complainant core participants; the
11 witnesses from the institutions; and others from whom we
12 have heard.
13 We are also very grateful to all of those who have
14 gathered and sent evidence into the inquiry for the
15 purposes of this investigation, even in these last few
16 weeks. Your efforts in bringing information to the
17 inquiry's attention are very much appreciated and it
18 will all be considered.
19 Finally, we would like to extend our thanks to all
20 of the representatives for their assistance and to all
21 of the inquiry staff for ensuring the smooth progress of
22 the hearings.
23 We will of course now review all the material
24 provided to us and provide a report on this
25 investigation and, as Mr Altman has said, we are aiming

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1 to provide that report just before the inquiry's interim
2 report, which is scheduled for publication
3 in April 2018.
4 With that, I will draw the hearings to a close, and
5 thank you very much to everybody for your participation.
6 Thank you.
7 (2.30 pm)
8 (The hearing concluded)

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